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REPORT OF THE SPECIAL COMMISSION ON WAGES AND HOURS IN THE FUR MANUFACTURING INDUSTRY

By

Paul Abelson
Chairman
Willard E. Atkins
H. LaRue Frain

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March, 1936

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F O R E W O R D

This report of the Special Commission on Wages and Hours in the Fur Manufacturing Industry was prepared by Messrs. Paul Abelson, Chairman, Willard E. Atkins and H. LaRue Frain.

The report was made in January 1935 and a small number of copies was released at that time. It is here reproduced in order that it may be made widely available to students in the labor field.

At the back of this report will be found a brief statement of the studies undertaken by the Division of Review.

L. C. Marshall
Director, Division of Review

March 6, 1936

January 22, 1935.

Mr. Leon Henderson, Director,
Research and Planning Division,
National Recovery Administration.

Dear Sir:

Herewith, we submit our report containing our findings and recommendations and the data on which said findings and recommendations are based.

The Special Fur Commission was authorized by Administrative Order, August 7, 1934, to recommend on the basis of study, investigation and public hearings, modifications of Article IV of the Code of Fair Competition for the Fur Manufacturing Industry as approved on May 19, 1934. The Commission was authorized to make such recommendations for the modifications of definitions of the respective areas and recommendations for the modification, change, increase or decrease of the differentials of the different areas as are deemed necessary to promote conditions of fair competition. The Order further authorized the Commission to investigate the labor conditions in the related industry engaged in the manufacture of fur articles on a custom basis and in remodeling and repairing of fur articles directly to the consumer. (See Appendix I, Administrative Order #436-10)

The functions and duties of the Special Fur Commission were subsequently modified by the Order of the National Industrial Recovery Board on October 15, 1934, making the work of the Commission a project of the Division of Research and Planning. (See Appendix II)

Work of the Commission: The work of the Commission consisted of the following phases: (a) studying transcripts of the hearings held before the fur codes were adopted; (b) study of the methods and pro-

cesses of manufacture in typical establishments; (c) preparation of the questionnaire; (d) analysis of the briefs; (e) study of compliance; (f) study of statistical materials available; (g) comparison of standard garments; (h) public hearings; (i) study of the petitions filed with the Administration requesting exemptions from the provisions of the Code. (See Appendix III)

The Commission held public hearings in Boston, Buffalo, Detroit, Chicago, St. Paul - Minneapolis, Seattle, San Francisco, Los Angeles, Kansas City, Memphis, Washington, and New York City. Additional investigations were held at Columbus, Pittsburgh, Baltimore, and Philadelphia. The hearings began on October 24, 1934, and concluded on December 2, 1934.

Since the hearings, the Commission has held numerous conferences to get a complete picture of the situation and to study such other elements in the economic situation as tend to impair the conditions of fair competition in this Industry.

The appendices made part of this report fully reveal the complexities involved in the situation and the inherent difficulties which the Commission has met in reaching the conclusions which we herewith present.

Respectfully submitted,

/S/ Paul Abelson, Chairman

/S/ Willard E. Atkins

/S/ H. LaRue Frain

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S E C T I O N I

RECOMMENDATIONS OF SPECIAL FUR COMMISSION

A. IF A POLICY OF CLASSIFICATION is adopted for this Industry, it is unanimously recommended:

I. That, in general, the major branches of fur article manufacturing be treated as a unit. These branches include the wholesale and custom manufacturing of fur garments, the manufacturing of fur trimmings, and the repair and remodeling of fur garments.

II(a). That basic hours be made uniform for the entire Industry, and that provisions for overtime be uniform.

II(b). That the basic week shall be 35 hours.

II(c). That 10 hours overtime per week for 10 weeks in a calendar year at one and one-half times the basic rate of pay be permitted.

II(d). That further overtime, at not less than twice the classified rate of pay shall be permitted upon application to a neutral body, providing (1) applicant is complying with the Code, and (2) shows inability to obtain the type of labor required.

III. That the following areas be established:

(a) For fur garment manufacturers:

Area A to include New York City.

Area B to include Chicago and New York Metropolitan Area outside of New York City.

Area C to include the entire country outside of Area A and B.

(b) For fur trimming manufacturers:

Area A to include New York City Metropolitan Area.

Area B to include the entire country outside of Area A.

(c) For fur piece plate manufacturers:

That the entire country be treated as a unit.

IV. That the wage rates set forth in the following table be established:

V. Exceptions.

(a) Establishments in Area B whose fur work is in direct response to orders or instructions of ultimate consumers and not employing more than two craft workers shall be subject only to the general minimum rate of 40 cents per hour.

(b) Establishments in Area B doing only custom work, including repairing and remodeling, and employing not more than six craft workers including proprietors, partners, and executives who do craft work, shall be subject to the wage provisions of the General Retail Code.

(c) Establishments in any area whose fur work is limited to the alteration of fur garments at the time of sale to the ultimate consumer, or establishments in which such work is segregated from manufacturing of new garments and the repair and remodeling of old garments, may be subject to the hour and wage provisions of the General Retail Code for such work.

VI. Neutral Agency. There shall be a neutral body to consider and recommend to the Administration relief in cases of:

(a) Applications for overtime in excess of 10 hours a week for 10 weeks in a calendar year.

(b) Applications of establishments for exemptions from specified rates in cases of undue and unusual hardships.

VII. Definitions.

(a) A multi-craft worker is a craft worker doing any two or more of the following: (1) operating, (2) nailing, (3) finishing, and (4) cutting on skins of inferior grades below Hudson Seal and in connection with repairing and remodeling work.

(b) A finisher's helper is one who sews in linings and does other work on garments of an incidental nature, such as sewing on buttons and making loops, either on new garments or on repair and remodeling jobs. To be entitled to a finisher's helper, an establishment must have at least one finisher.

(c) A learner is one who has had no previous experience in the Industry. During the first 16 weeks of learner's status, the rate of pay must be advanced according to the schedule, and if employment continues after the 16th week, the individual must be classified not lower than a finisher's helper. An establishment may have at least one learner if it has a finisher. If it has a finishing force of more than six finishers and helpers, it may have one learner for each six, not including apprentices.

B. IF A POLICY OF CLASSIFICATION is not adopted, it is the majority recommendation.

I. That all branches of fur article manufacturing be treated as a unit.

II(a). That basic hours be 40 per week throughout the Industry.

II(b). That overtime shall be compensated for at a rate of not less than one and one-half times the basic minimum rate.

III. That the country as a whole be treated as two areas.

CLASSIFIED WAGE RATES RECOMMENDED FOR FUR MANUFACTURING

FUR GARMENTS

Area	Territory	Size of Population	Type of Manufacturing	Size of Shop (Number of Craft workers)	Crafts	Class and Learner Time	Wage Rates Weekly	Wage Rates Hourly
A	New York City		Wholesale and Custom	Any	Cutter	First	$50.60	$1.45
					"	Second	44.00	1.25
					Operator	First	41.00	1.17
					"	Second	35.00	1.00
					Nailer	First	39.60	1.13
					"	Second	33.00	.94
					Finisher	First	38.50	1.10
					"	Second	30.80	.88
B	Chicago; New York Metropolitan area, outside of New York City	Any	Wholesale	Any	Cutter	First	43.85	1.25
					"	Second	36.75	1.05
					Operator	First	35.00	1.00
					"	Second	29.78	.85
					Nailer	First	33.25	.95
					"	Second	28.00	.80
					Finisher	First	29.75	.85
					"	Second	24.50	.70
			Custom	Three or more	Cutter	First	43.85	1.25
					"	Second	36.75	1.05
					Operator	First	35.00	1.00
					"	Second	29.78	.85
					Nailer	First	33.25	.95
					"	Second	28.00	.80
					Finisher	First	29.75	.85
					"	Second	24.50	.70
			Custom	Two or less	ANY	ANY	General minimum	
C	Entire Country Outside of Areas A and B.	(1) Cities with 200,000 population or more	Wholesale	Any	Cutter	Any	55.00	1.00
					Multi-craft worker	Any	22.75	.65
					Operator	Any	22.05	.63
					Finisher	Any	21.00	.60
					Finisher-Helper	Any	15.75	.45
					Finisher-Learner	6 weeks	8.05	.23
						4 weeks	10.15	.29
						5 weeks	12.25	.34
						After 8 weeks	15.75	.45
			Custom	Any	Any	Any	General Retail Code Provisions	
		(2) Cities with less than 200,000 Population	Wholesale	Any	Cutter	Any	55.00	1.00
					Multi-craft worker	Any	22.75	.65
					Operator	Any	22.05	.63
					Finisher	Any	21.00	.60
					Finisher-Helper	Any	15.75	.45
					Finisher-Learner	6 weeks	8.05	.23
						4 weeks	10.15	.29
						5 weeks	12.25	.34
						After 8 weeks	15.75	.45
			Custom	more than six	Cutter	Any	55.00	1.00
					Multi-craft worker	Any	22.75	.65
					Operator	Any	22.05	.63
					Finisher	Any	21.00	.60
					Finisher-Helper	Any	15.75	.45
					Finisher-Learner	6 weeks	8.05	.23
						4 weeks	10.15	.29
						5 weeks	12.25	.34
						After 8 weeks	15.75	.45
			Custom	six or less	Any	Any	General Retail Code Provisions	

FUR TRIMMING

Area	Territory	Crafts	Class	Wage Rates Weekly	Wage Rates Hourly
A	New York City (Metropolitan Area)	Cutter	First	$60.60	$1.45
		"	Second	44.00	1.25
		Operator	First	41.00	1.17
		"	Second	35.00	1.00
		Nailer	First	39.80	1.15
		"	Second	33.00	.94
		Finisher	First	38.50	1.10
		"	Second	30.80	.88
B	Entire Country Outside of Area A	Cutter	First	43.85	1.25
		"	Second	36.75	1.05
		Operator	First	35.00	1.00
		"	Second	29.75	.85
		Nailer	First	33.25	.95
		"	Second	28.00	.80
		Finisher	First	29.75	.85
		"	Second	24.50	.70

FUR PIECE PLATES

Area	Territory	Crafts	Class	Wage Rates Weekly	Wage Rates Hourly
A	Entire Country	Cutter	Third	$33.00	$ .94
		Operator	"	28.00	.80
		Nailer	"	28.00	.80

IV. That the basic minimum rate of pay shall not be less than $14.00 per week in cities of 100,000 population or more and not less than $12.00 in other places.

C. These recommendations are to be considered as minimum scales only. They in no sense are to exclude the possibility of workers, either by individual or collective contracts, arranging for higher scales.

S E C T I O N II

SECTION II

DESCRIPTION OF THE INDUSTRY

A. NATURE OF FUR WORK

Skins of fur-bearing animals, after being dressed and dyed, are used in making a variety of fur articles. The main use occurs in making coats, and to a lesser extent, such wearing apparel as capes, scarfs and muffs. They are also used in making collars, cuffs and other trimming for cloth coats, suits, and dresses. Other uses include caps, robes, and fur novelties such as kittens and dogs.

In making wearing apparel, especially coats, the usual separation of wholesale and custom manufacturing does not disclose satisfactorily, for the present purpose, the nature of work done in fabricating furs. Possibly, the most hopeful approach distinguishes work done on new as against old garments.

New articles may be made under two conditions with respect to sale. They may be made in anticipation of demand, or they may be made in response to demand, particularly of ultimate consumers. (See Diagram No. I)

Those garments made in anticipation of demand may be either completely or partly finished, prior to sale. The completely finished garment, made in advance of sale, may be made for stock or for sample and display purposes. Nothing in the manufacturing process indicates the purpose for which a garment is being made. The key to the difference is generally the number of garments made to a given size and pattern. Only one or a few garments of a kind are made for sample or display purposes, whereas a larger number is likely to be made for stock.

Partly finished garments are made in anticipation of sale. Usually the body of the garment is made with rather standardized sizes and patterns in mind. At a subsequent time, these "shells" are turned into finished garments as occasion requires by adding collars and sleeves of such patterns as buyers dictate.

When garments are made in advance of sale, there is usually some alteration necessary to meet the requirements of individual users. These alterations are similar in nature to those designated as "busheling" in the altering of cloth garments. For example, the sleeves may be too long and require shortening, the body may be too full and must be taken in or the collar is too high and must be lowered. Thus, the alteration extends from changing the location of a button to altering the shape and size of the garment itself. In custom manufacturing, the alterations are done in the process of making the garments.

While the most important work on new articles occurs in the fabricating of skins into wearing apparel, either as garments or as trimmings, there is also some fur work done in making "piece plates." In the course of making garments or trimmings, there are waste cuttings which are sewed together into piece plates. These waste pieces are purchased and collected by establishments specializing in manufacturing piece plates. The plates themselves are used in making lining for coats,

especially men's coats, trimmings, caps and novelties. In some instances, even garments have been made from them.

The more valuable the fur in a garment, the more likely the garment is to be remodeled from time to time in conformity with style changes. In this process, new skins may have to be inserted, and new parts may be added, such as collars and cuffs. Nearly all fur articles, especially the cheaper ones, require repairing from time to time. This may involve sewing a rip, replacing worn skins or altering the garment to conceal the worn parts. There is virtually no remodeling of cheaper garments, since the cost of remodeling would be proportionately high in relation to a new coat.

The relative importance of repairing and remodeling may be judged by both the number of establishments doing it and the extent to which they do it. An analysis of questionnaires indicates that for reporting firms, repairing and remodeling is (1) more important for establishments outside of New York City than in New York City and (2) more important for the smaller than the larger establishments. A further analysis of this point is found in the Appendix.

From the above description, it appears that a variety of work is involved in fabricating skins of fur-bearing animals into useful articles, mainly wearing apparel. Such variety of work gives rise to, and is accompanied by, different types of establishments. The resulting interrelation is important in formulating a workable concept of manufacturing for codal regulations in this Industry.

B. TYPE OF ESTABLISHMENTS DOING FUR WORK

Not only is there a wide variety of fur work, but this work is done by various kinds of establishments. In some of these establishments, fur work is the predominating business, while in others it is combined with an appreciable amount of retailing, either of furs alone or of other merchandise also, as in department stores. In these retailing establishments, fur work may be a small or even negligible part of the entire business. There is no currently accepted terminology which is a satisfactory clue to the nature of the fur work done in these various establishments. (See Diagram No. II)

I. FUR GARMENT MANUFACTURING

1. Wholesale Establishments

Wholesale manufacturing of garments is centered almost entirely in New York City. It is doubtful if as much as ten per cent of the total is done outside of this city. For the most part, these establishments manufacture stock garments in quantities in anticipation of, and in response to, orders received from jobbers, department stores, specialty shops and fur shops, etc.

Few, if any, establishments confine themselves to wholesale business. Most of them engage to some extent in doing custom work or

P. 1A

DIAGRAM I

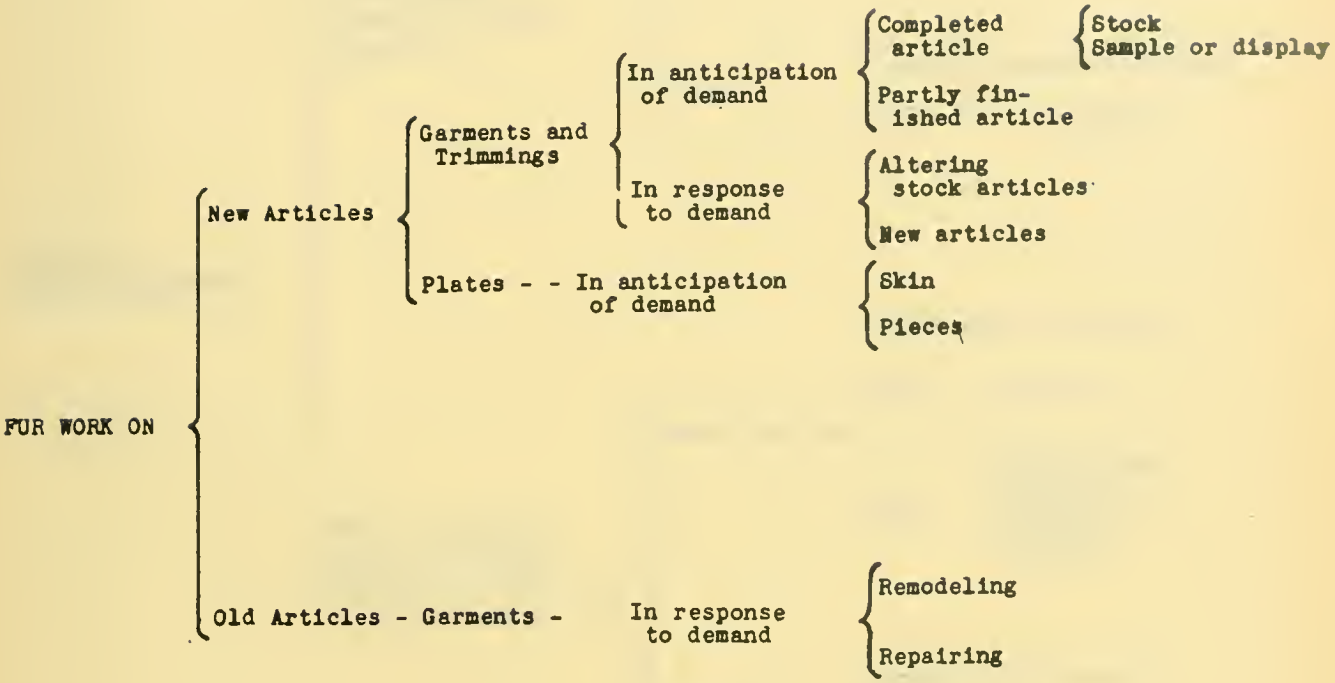


DIAGRAM SHOWING TYPES OF FUR WORK

DIAGRAM II

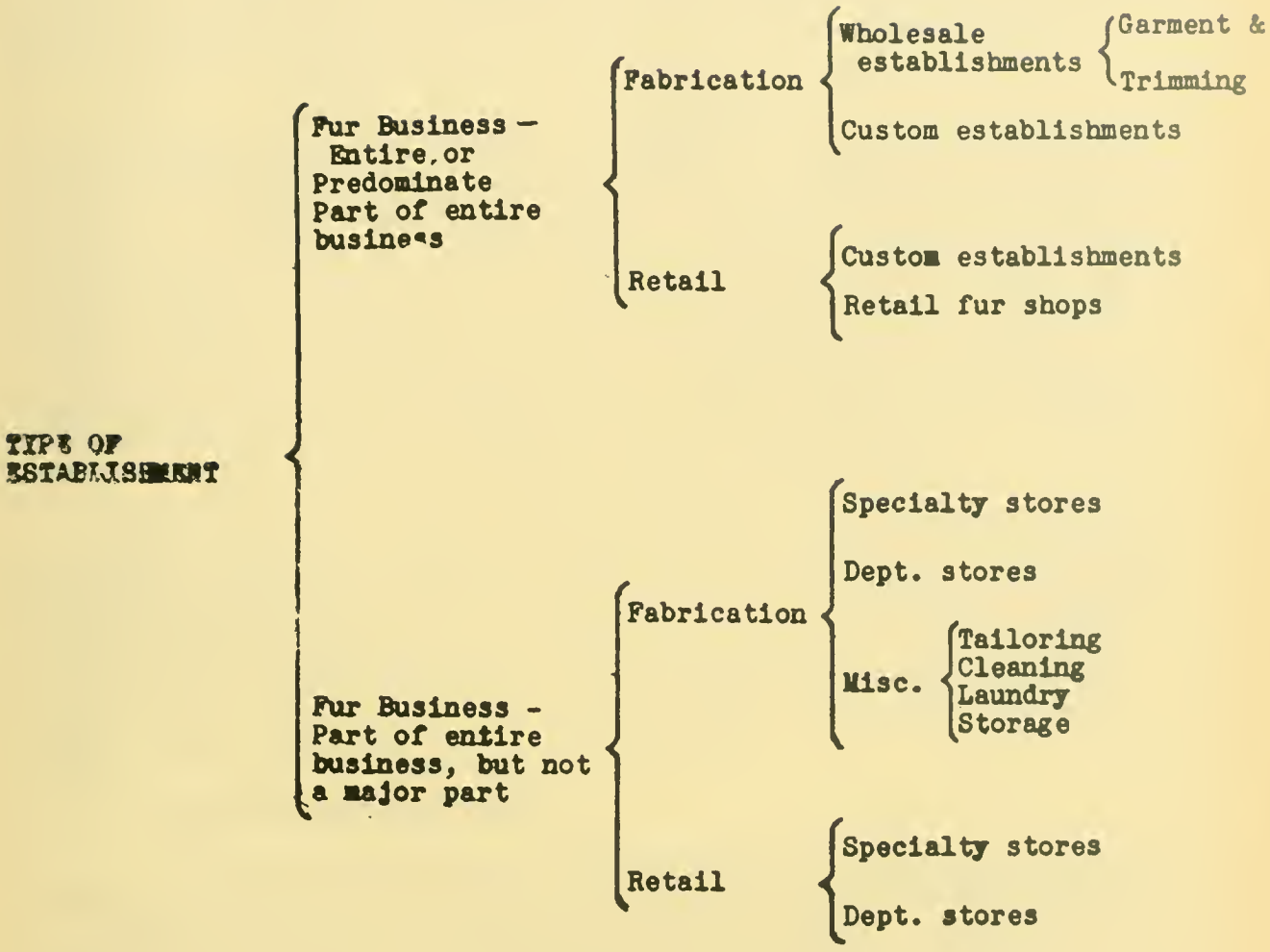


DIAGRAM SHOWING TYPE OF ESTABLISHMENT

its equivalent. In part this arises from the fact that many of the furriers in the small cities and towns throughout the country advertise themselves as custom furriers, but are not equipped to do the actual custom work themselves. They take the measurements for the individual customers and send these measurements to a wholesaler in New York City. If the specifications conform fairly well to a garment in stock, such a garment is used with appropriate alterations. If a stock garment cannot be used, then a new garment is built especially for this customer. The wholesale establishments not only do such work for members of the trade, but also for such ultimate buyers as may come to them directly through the suggestions of friends and acquaintances. Thus, so far as new work is concerned, the wholesaler carries on fur work both in anticipation of demand and in response to demand, for both trade customers and individual consumers.

Wholesale establishments also do remodeling and repairing work on old garments. Such activities do not ordinarily constitute an important part of a wholesale establishment's business. In periods of inactive business, the wholesaler is more likely to encourage such business than when he is reasonably busy with new work. Generally, repairing and remodeling work is done on a more or less service basis to his trade customers. Thus, if a specialty store in say, Columbus, Ohio, obtained an order to remodel a mink coat, the local establishment would probably send the job to its mink wholesale house in New York City and that establishment would do the remodeling as a service activity for its customer in Columbus. Such servicing is one of the means by which contacts are maintained between the wholesaler and his retail outlet.

From the above, it appears that the wholesale establishment does not restrict itself to wholesale manufacturing. In addition, some houses do custom manufacturing, retailing, repairing and remodeling. Some do these things secretly while others do them openly. Some of them claim that they do it only under special circumstances, while others admit that they will accept any business they can get. In short, the activities carried on by wholesale establishments tend to run the entire gamut of activities with respect to fur work.

2. Custom Fur Establishments

Custom establishments are distinguished from wholesale establishments not so much by what they do, as by the extent to which they do it. Especially with fine garments, the entire garment is likely to be made after the order has been received and in conformity with the customer's measurements and specification as to style, finishing, etc. Such completely individual attention is not given to perhaps most of the garments made by the custom furrier. In the first place, the furrier can anticipate some of his requirements. He can, for example, make skin plates, which means he can sew skins together into pieces sufficiently large to permit the subsequent cutting of various parts of a specially ordered garment. Indeed, he can anticipate even more than this. Most custom garments call for clearly standardized parts, such as backs, and sides. Consequently, these parts, called a "plate", may be made in advance of demand. The genuinely custom or individual attention is most likely to occur in giving shape to the coat, style to the collar and

cuffs, and in finishing the garment. Thus, on garments made for individual customers, some of the work is generally done in advance of the order while the balance of the work is done in response to the order.

In addition to such work, the custom furrier is likely to make some new garments in advance of demand. He makes some for display purposes; these garments are used for much the same purpose as the sample garments of the wholesaler. But the custom furrier is likely to go further, and in the off season makes garments of such styles as he believes will be sold rather easily. This work is similar to that done by the wholesaler, except that the wholesaler is likely to make more garments from a single pattern then the custom furrier is likely to make.

Most custom furriers sell not only the garments they make, but also those purchased from wholesalers and jobbers. Indeed, in many cases, the custom furriers sell more ready-made than custom-made garments. Seldom do the ready-made garments fit the customers satisfactorily. Consequently, alterations are necessary. These alterations may extend from minor changes, such as shortening the coat, to rather extensive alterations and in some cases, require remodeling.

Remodeling and repairing of old garments is a rather important part of the custom furrier's business. Especially is this the case with the smaller furrier and for many of them, the repairing and remodeling work constitutes their entire manufacturing activities.

For the custom furrier, repairing and remodeling is advantageous as a means of keeping in contact with prospective customers for new garments, and it also brings in some business which can be done, at least in part, in the off season. Thus, it appears that custom furriers engaged in virtually all the types of fur work previously mentioned, although the proportion of the various kinds of work differs widely as between establishments.

3. Retail Fur Shops

With changes which have been occurring in the Industry, a number of retail fur shops have come into existence. For the most part, these establishments sell stock merchandise which they have purchased from wholesalers or jobbers. They may also cater to the custom trade in that special measurements will be taken and sent to the wholesale manufacturers. In most of these establishments, the fur work consists of slight alterations of stock garments and the repair of old garments. If any extensive alterations of a new garment, or remodeling of an old garment, are necessary, the work is sent to a wholesaler or perhaps given to a contractor.

Such shops, doing virtually no new work, constitute the connecting link between those enterprises or establishments whose business is mainly in furs and those establishments with which fur business is only a part.

4. Specialty and Department Stores

In those establishments selling wearing apparel mainly, and in

those selling a wider variety of merchandise, the fur business may be large in absolute volume, but small in relation to the total business. In some cases, the fur department is under the ownership and operation of the store management, while in other cases, the department is a leased department. The extent to which leased departments exist is extremely difficult to determine. In such cases, an outside party, such as a manufacturer or jobber, is likely to conduct the fur business of the store under the general supervision of the store management. Customers are seldom aware that they are dealing with a third party.

In any case, the type of fur work done in these stores varies quite widely, extending from alterations on new garments at the time of sale up to the making of new merchandise. Any store selling new garments must have some facilities for altering them as occasion requires. Many stores, however, have discontinued work on new garments either for stock or for display purposes. Insofar as stores have this work done, they are likely to have it done by wholesalers or perhaps by local contractors.

Most stores seek repair and remodeling work. They generally do at least the repair work in their own establishment and they also do the remodeling work, although if the remodeling is extensive and the garment is valuable, they are likely to have it done either by wholesalers, contractors, or perhaps by arrangement with some local custom furrier.

Some stores cater to the custom trade and maintain a staff of craft workers with high skill. In order to maintain this corps of skilled workers, an attempt is made to furnish employment in the off season. In that period, plates, shells and even entire garments of a stock nature are made.

5. Miscellaneous Establishments

Some fur work, especially repairing, is done by a miscellaneous group of individuals and enterprises such as tailors, dry cleaners, laundries, storage warehouses, and even banks. The fur work done by most of these establishments is a small part of their total business and in many cases is incidental to their main business. For example, some banks are using their vaults for storage purposes and are offering cleaning and repairing service as a means of attracting customers.

These miscellaneous establishments may have fur workers as employees, but more frequently arrangements are made with some fur workers or with some fur establishments to do the fur work on a contracting basis. Comparatively few of these establishments are equipped or able to do fur work of a high grade such as is required with remodeling good garments and doing new work. Insofar as occassion arises for such remodeling or new work, this is likely to be given to contractors or others better prepared to do it.

Diagram II shows these types of establishments graphically.

6. Summary

The dual relation of different kinds of work and different

types of establishments gives rise to such numerous and conflicting combinations, that it is not feasible to separate most fur work, either on the basis of the kind of work done or on the basis of the type of establishment doing it. Consequently, if garment manufacturing is to be regulated, it must be regulated in the main, as a unit.

II. FUR TRIMMING MANUFACTURING

1. Wholesale Establishments

Trimming manufacturing, like garment manufacturing, is centered in New York City, but to a lesser extent. Trimming manufacturing is likely to occur wherever cloth garments, especially women's coats and suits, are made in any appreciable quantity. These establishments make stock merchandise but also manufacture largely in response to orders received from cloth garment manufacturers. In some cases, the trimming manufacturers also make other articles such as caps, scarfs, muffs, lap-robes, and even garments. These are sold mostly to the trade, but many places sell directly to ultimate buyers. Repairing and remodeling is done to some extent in these establishments, but usually not to any important degree.

The variety of work which these establishments are likely to do is conditioned mostly by the activity of their main business. If the main business is slack, an attempt is made to reach into other fields and get such business as their existing facilities permit them to handle. On the other hand, when their main business is active, they concentrate on it.

2. Cloth Coat and Suit Establishments

Some manufacturers of cloth garments requiring fur trimming, do not rely on fur establishments for the fur trimming, but manufacture these trimmings themselves. In such instances, the fur work done is likely to be restricted to that required by the establishments themselves for their own manufacturing of cloth garments. In some instances, a cloth garment manufacturer who is also manufacturing his own trimmings may sell these to other cloth coat manufacturers who are not manufacturing their fur trimmings.

While there is an appreciable interrelation between trimming and garment manufacturing, it appears reasonably feasible to separate these activities for codal regulations.

III. FUR PIECE PLATE MANUFACTURING

Fur piece plate manufacturing is confined almost entirely to New York City. In no other place is the volume of small waste pieces of fur sufficiently large to warrant their collection and manufacture into "piece plates". These plates are used in a variety of ways, but especially in making the lining for men's coats, trimmings, fur caps and miscellaneous novelties. To some extent these plates are now being used in the making of fur garments.

In many cases, fur piece plate establishments do not confine

themselves to the manufacturing of plates but also manufacture trimmings and even garments.

Despite this overlapping, it appears feasible to separate piece plate manufacturing from other fur manufacturing for the purpose of codal regulations, because of the low grades of skill required and the kind of article made.

SUMMARY

The foregoing description of the establishments doing fur work indicates that there is substantial interrelations within and between the various branches of fur manufacturing. This is shown graphically by Diagram III. This suggests that any regulation of wages and hours designed to establish fair competitive conditions must seek a balance between different branches of the Industry.

C. SPECIALIZATION WITHIN BRANCHES OF THE INDUSTRY

Not only is there specialization within the Industry as between garments and trimmings, but within each of these major branches there is further specialization.

1. Type of Fur

Especially in wholesale manufacturing in New York City there is a growing tendency to restrict activities to one or a few kinds of furs. Thus, some establishments are known as "mink houses", and others as "squirrel houses". Similar specialization is found among the wholesale manufacturers of trimmings as with "fox houses".

2. Price Range

Closely akin to specialization by furs, but not identical with it, is specialization within a price range. Thus, some places specialize in a group of extremely fine and valuable furs, such as ermine, broadtail, chinchilla and sable. There is a second group of establishments specializing in some one of such valuable furs as mink, caracul, Persian lamb, or squirrel. The next group takes in the "muskrat" houses, or those specializing in Hudson seal, neutria and natural muskrat. The lowest is the rabbit group, manufacturing garments under various trade names, such as French seal, Northern seal, sealine and lapin.

Along with such specialization there continues to be establishments making "general lines". Seldom is it advantageous for these houses to include the cheapest garments in their lines. Outside of New York City most wholesale manufacturing is general line work except on the Western Coast.

Such specialization in a measure explains the relatively high wages in New York City. Through specialization an opportunity exists for workers to attain maximum earnings through development of dexterity and productive speed within a limited range of work. This in turn means that general line and custom establishments must pay similar wages in

order to have competent workers capable of doing diversified work. Furthermore, the distinction between first and second class craft workers, as set forth in labor agreements especially in New York City, is based largely on the types of fur worked upon and the speed with which the work is done.

D. COMPETITIVE ASPECTS OF THE INDUSTRY

Intensely keen is the competition in this Industry. The intenseness may be accounted for in large part by two circumstances. In the first place, the depression in this Industry began about 1927 which was, of course, before the general decline in business activities. This longer period of poor business has operated as an incentive to shifting in lines of specialty, thus creating keener competition in those lines which are most popular at a given time. In the second place, the ease with which this business can be entered has made it highly competitive.

The most pronounced competition may be viewed from at least six angles:

(1) Within major branches of the Industry
(2) Between branches of the Industry
(3) Between the Industry and other lines of business
(4) Between geographic areas
(5) Between employer and employees
(6) Between employees

1. Major Branches of the Industry

Garment houses compete with garment houses. Establishments specializing in making mink garments, for example, compete not only with other mink houses, but with houses making other high priced garments of a similar kind. These houses compete with those making more moderately priced garments, such as Hudson seal (muskrat) and these houses in turn with establishments making both similar garments from other types of furs and establishments still making lower priced garments, such as sealines (rabbit).

A similar chain of competition is found in fur trimming manufacturing.

Then there is competition between establishments designating themselves as wholesale manufacturers and those designating themselves as custom manufacturers. The stock garments of the wholesaler are sold indirectly to consumers through departments stores, specialty stores and retail fur shops, etc. Thus, these garments compete with the custom garments sold directly to consumers by the custom manufacturers. Moreover, establishments specializing in making stock garments also make custom garments and custom garment manufacturers also make stock garments.

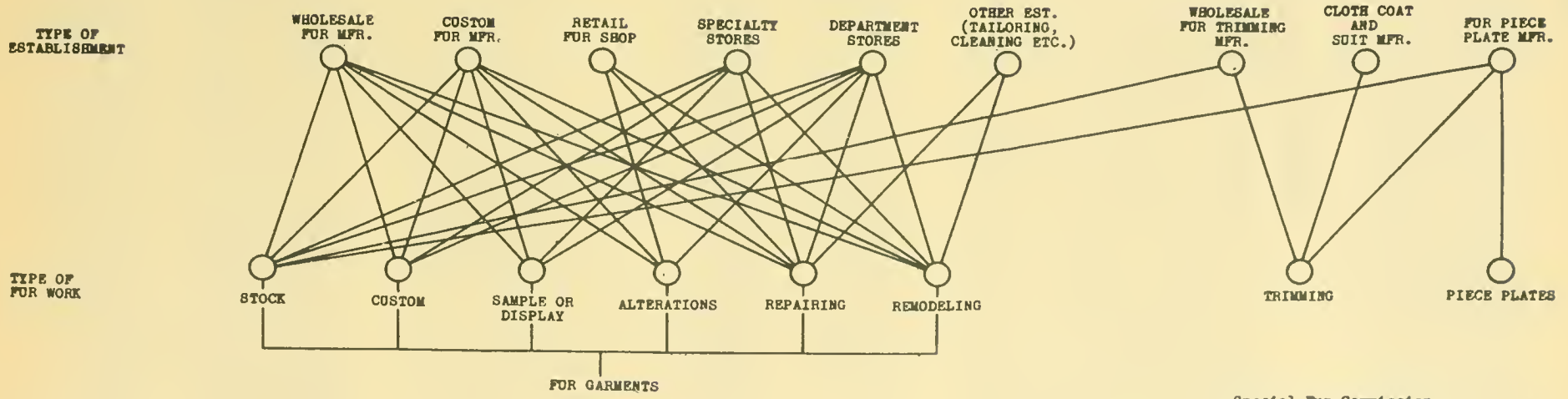
Thus, the interrelation of types of work and types of establishments doing fur work gives rise to intense competition.

2. Between Branches of the Industry.

While fur garments and fur trimming manufacturers, as such, do not

DIAGRAM III

DIAGRAM SHOWING INTER-RELATION OF FUR WORK AND TYPES OF ESTABLISHMENTS



Special Fur Commission,
Division of Research and Planning, N. R. A. 1935

compete directly so far as their respective products are concerned, they do come into direct competition when trimming manufacturers make garments and garment manufacturers make trimmings. Similarly, piece plate manufacturers, as such, do not compete with either garment or trimming manufacturers, but when the plate manufacturers also make trimmings and garments, there is direct competition especially in the range of low priced garments and trimmings.

3. Between the Industry and Other Lines of Business.

Here, as in other fields, there is overlapping as between different lines of business. In garment manufacturing, especially in the lower price range of garments, furs come into competition with cloth garments. The custom manufacturers of garments come into competition with such retail outlets for the wholesale manufacturer's garments, as department stores, specialty shops and fur shops. These retail outlets also compete with custom manufacturers for repair and remodeling work.

The wholesale manufacturers of trimmings come into competition with those manufacturers of cloth coats and suits who make fur trimmings themselves, either for their own use or for sale to other coat and suit manufacturers.

The fur piece plate manufacturers come into competition, at least to some extent, with skin dealers. To some degree, fur piece plates are used where new skins would be too expensive to be used. But there is a range within which substitution is feasible.

In doing repairing and remodeling work, garment manufacturers especially come in conflict not only with retail establishments but with branches of the service trades such as tailors, cleaners, laundries, storage establishments. (See Diagram IV)

4. Between Geographic Areas

In garment manufacturing, the New York City wholesalers fear the outside wholesale and custom manufacturers, while the outside wholesale and custom manufacturers fear the New York City wholesalers. The competitive influence of the New York City wholesaler is felt outside by way of jobbers, resident buyers, commission men and traveling salesmen. The outside manufacturers, on the other hand, reduces the possible market for New York City products.

There is reason to believe that the competitive fears of New York City wholesalers are much less justified than are those of manufacturers outside New York City. Not only recently, but for a period of years, outside manufacturers have been losing ground to New York City, especially in the lower priced garments. Only one instance came to the attention of the Commission of outside wholesalers selling their product in New York. Boston, once a wholesale area has ceased to be such.

In trimming manufacturing, the situation is somewhat different. Here, as with garments, the bulk of the business is done in New York City, but for different reasons. Trimming manufacturing arises wherever

coat and suit manufacturing is done on any appreciable scale. The major localization of cloth coat manufacturing is in New York City and this carries with it a major localization in the manufacturing of fur trimming. However, an appreciable fringe of fur trimming manufacturing is done in the other cities in which cloth garment manufacturing exists.

5. Between Employer and Employee

Both in and outside New York City a condition exists by which the employee competes with the employer. Especially in New York City, craftsmen have business cards stating that they design and make new garments and also repair and remodel old garments. If these craftsmen are employed at the time, they may turn their order over to their employer on a commission basis. More generally, whether employed or unemployed, they do the work themselves. In some instances, the work is done in their homes, although at times employees are permitted to use the employer's equipment and facilities at noon and after closing hours. Usually such enterprising employees obtain the assistance of their fellow-workers to do part of the job. Thus, a cutter may engage fellow-workers to sew the skins and finish the garment. When craft workers lose their jobs, they are likely to become self-employers rather promptly.

6. Between Employees

A somewhat different aspect of the competition created by employees becoming self-employers arises in the case of "contracting". In most establishments, the fur work is done on the employer's premises and by employees who are paid by the week or the day. At times work is given to employees to be done in the shop on a piece or contract basis. In New York City, for example, union contracts forbid such work.

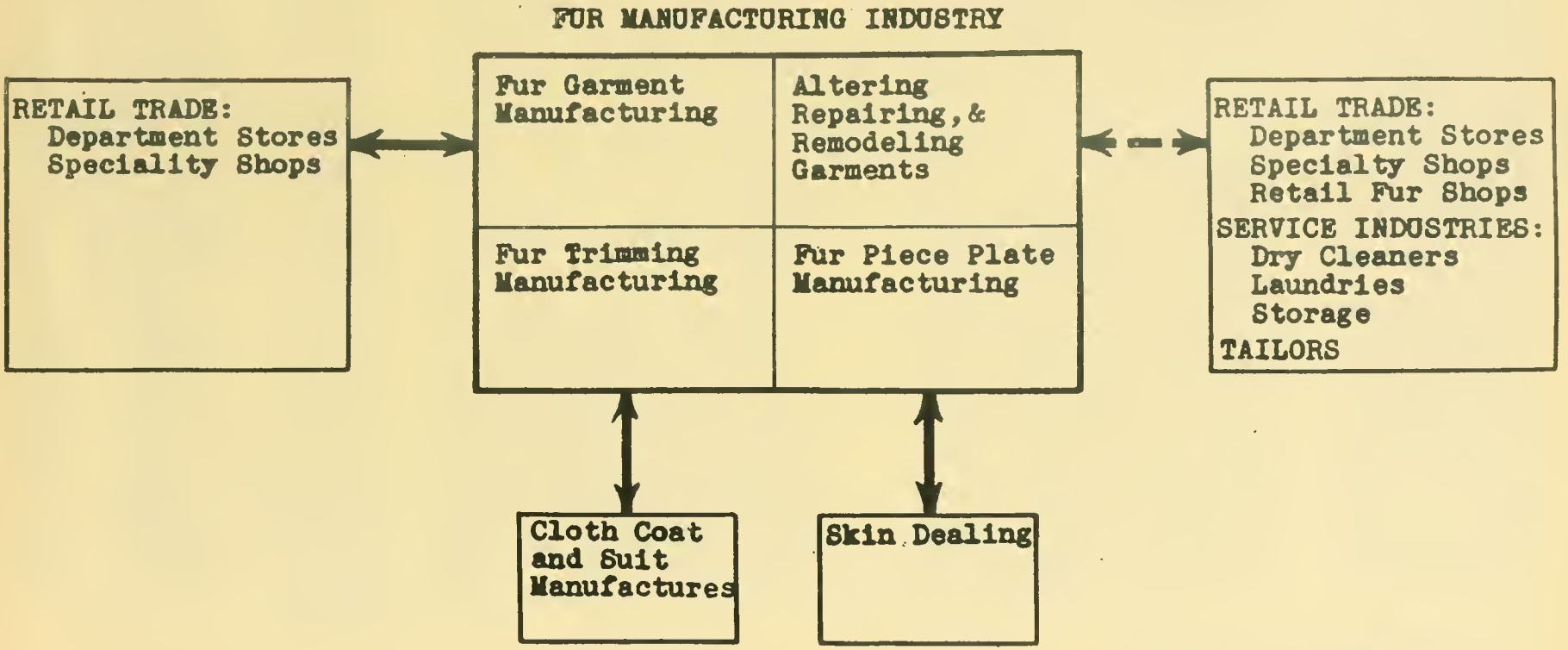
On the other hand, fur work may be entrusted to individuals to be done off the premises on a piece work basis. The piece rates so paid are designed to give the manufacturers lower costs than if established rates were paid in the shops. Such work is designated as "outside contracting."

Outside contracting is likely to arise under any one of several circumstances. In some establishments at the height of the season, there may be inadequate space for the employer to bring sufficient workers into his shop. An alternative is to have the work done outside of the shop. More generally, outside contracting arises as a means of evading established rates of pay, whether rates set by union contract or by codal provisions. Especially in periods of slack employment is there considerable incentive for the employer to resort to outside contracting. In some cases, the evasion of established rates is deliberate, as where an employer seeks to get his work done in the cheapest way possible. In other cases, it is done as the sole means of meeting competition. Thus, when an employer who is willing to pay established rates provided competitors are paying the same rates, find competitors evade these rates by contracting, then he may find himself forced to resort to the same device of evasion.

Not all manufacturers are in a position to take advantage of outside contracting even though they might desire to do so. Manufacturers making

DIAGRAM IV

COMPETITIVE POINTS BETWEEN FUR MANUFACTURING INDUSTRY AND OTHER BRANCHES OF BUSINESS



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garments from valuable furs cannot afford to run the risk of having their contractors substitute even one, to say nothing of more, skins. Consequently, outside contracting is confined to garments made of the lower grades of furs, where the incentive for substitution is relatively small and where the possible disadvantage of the manufacturer is comparatively small. The advantage to a contractor in substituting a skin worth 15 cents for one 25 cents is quite different than substituting a skin worth $1.00 for one worth $5.00

These conflicting aspects of the Industry must be evaluated in forming codal regulations designed to aid the Industry as a whole. To some extent, immediate interests of different groups are in irreconcilable conflict, and to a lesser extent it is likely they will continue to be so indefinitely. However, the existing conflicts within the Industry and within branches of it loom so large and impressive to most individuals in the Industry that they are unable to recognize such common interests as exist. Under such circumstances it is not surprising that either of two general proposals are usually advocated as the necessary means of establishing and maintaining fair competition: (1) Let others do as they want but let us alone, or (2) make others conform to our policies, practices and standards. Consequently, any codal regulations based upon conditions in the Industry as a whole will be viewed by those in the Industry as purely arbitrary.

E. CRAFT WORK

Despite the inroads of machinery in many lines of business, the fabrication of furs continues to be essentially a hand craft industry. In some operations no mechanical assistance is available. This is especially true in the selection, matching and cutting of skins, in the nailing and stretching of them, and in some parts of the finishing work. In other processes hand fed machines have come to be used. Virtually every shop has a specially designed machine for sewing furs and also an ordinary sewing machine for sewing parts of a cloth lining together. A less widely used mechanical machine device is the "staying-machine" designed to attach an inter-lining to the skins. Such machinery has been of assistance entirely in speeding up the time required for certain operations on a single garment. In no instance has this machinery made it possible for an individual to perform an operation simultaneously on a number of garments.

The nearest approach to multiple work occurs in those comparatively few establishments which have devices for cutting a number of cloth linings for a garment simultaneously by means of a mechanically operated circular blade. It is also possible to do some part of the cleaning work simultaneously on a number of garments by means of a revolving drum.

Even where the maximum mechanical equipment is used, it is substantially true that every garment is individually made from the original matching of the skins to the insertion of the lining of the finished garments. This is true of the lowest and the highest price garment whether made by wholesale or custom manufacturers.

From the foregoing two pertinent observations may be made: First, with such little opportunity for mechanization in this Industry, codal

regulations can not result in any important substitution of machinery for hand labor. Second, the apparently inevitable reliance of the Industry upon handwork makes it easy for small establishments, family enterprises and self-employers to operate in the Industry. This condition creates very real limits to effective codal regulations of wages and hours.

F. SIZE OF BUSINESS UNITS

Whether the size of establishments is measured by the number of factory workers, or by the dollar volume of manufacturing, it appears clearly that small establishments predominate in this industry. Along with them is an insignificant number of large establishments.

1. Number of Craft Workers

Viewing the Industry as a whole, about a quarter of the workers are in establishments with one or two shop workers and about half of the establishments have four or less workers.

When New York City is separated from the rest of the country several different tendencies appear. (1) Establishments with one or two workers are relatively more numerous outside than in New York City. (2) Establishments with four to seven workers are about equally prominent both in and outside of New York City.

These tendencies are set forth more fully in the Appendix.

2. Volume of Business

About 25 per cent of the reporting establishments did $6,000 worth of fur manufacturing or less, including repairing and remodeling in 1933 and about 40 per cent did less than $10,000.00. This is considered more fully in the Appendix.

Here the tendencies in and outside of New York City are quite different. Establishments tend to be smaller outside the city than in it. While only 15 per cent of the New York establishments did $6,000 or less in manufacturing, 30 per cent of the outside establishments did a similar amount. Twenty-three per cent did less than $10,000 in New York City, as against 47 per cent outside and 66 per cent did less than $60,000 in New York City compared with 90 per cent outside of New York City.

3. Investment

No statistical information has been obtained as to the investment in fur manufacturing establishments but common knowledge and observation discloses one very important fact. Anyone with the required craft skill can engage in fur work with an investment for machinery and equipment of less than $100. In many instances second hand equipment would be used.

In many industries extremely small concerns are likely to be highly inefficient and high cost producers. Under such circumstances a policy

of regulation designed to serve the industry and the public might well eliminate these concerns. But in this Industry the small concern is not necessarily inefficient. Indeed the productive efficiency of small units here may be as great as or greater than that of larger units. In other respects such as credit, lower prices for purchase of volume of supplies, etc., small concerns operate under a disadvantage compared with the larger ones.

The comparative importance of small concerns depends somewhat on whether they are concentrated or scattered geographically and some what on the types of work done with a highly localized market as in New York City. A considerable volume of work is done by small establishments. This is especially done in trimming manufacturing. But in the absence of such concentration the main work of the small establishments is repairing and remodeling. Thus, many of the small establishments deal exclusively with individuals in their own communities.

This analysis of business units leads to several conclusions: First, any codal regulation which would either intentionally or unintentionally drive small enterprises out of existence would be both undesirable and ineffective. It would be undesirable because the prominence of hand work permits small establishments to operate rather efficiently. It would be ineffective because it is too easy for individuals, family, and partnership enterprises to carry on fur work in homes, garages, and not easily discovered lofts. Most of these establishments do not keep books, shift rapidly from place to place, and lock their doors against inspection. Consequently if the bulk of small establishments is regulated to any important extent, preparations must be made for a very heavy enforcement burden.

G. SPECIALIZATION OF LABOR

An analysis of the typical steps taken in manufacturing fur garments discloses about twenty very distinct operations, extending from matching the skins to final inspection of the finished garment.

The old, all-around craftsman, of which a few still exist was able, to, and actually did, perform all these operations himself. But today, a single craftsman seldom, if ever, performs all of them himself. The extent of division of labor depends upon the location, size, and type of establishment.

Speaking in general terms, the most extensive division of labor occurs in New York City, and here, with the larger establishments, which means mainly, the establishments engaged in some specialized line of wholesale manufacturing, such as Hudson Seal.

Four more or less distinct types of activities are generally recognized, at least where collective agreements exist. In many instances, the activities are not nearly so clearly defined as the common terminology might suggest.

A. Cutters

The most highly skilled craft is that of cutters. In addition to

actually cutting the skins, this individual, who is almost always a male worker, frequently matches the fur. In the larger establishments, the cutter is not engaged in other activities, but in the smaller places he may nail the skins and even sew them on the machine. He may also do cleaning and glazing, but seldom does he do finishing work. In the small establishment the proprietor is likely to be the cutter.

This craft, together with others, is at times found divided into first and second classes, and in some instances, into even more classes. To this point, attention will be given later.

B. Operators

Next to the cutter, the "operator" is the most skilled worker in the fur establishment. This individual sews the skins at two or three stages in the manufacturing process. With some skins, such as Mink, for example, garments are made by cutting individual skins into small strips. These strips are then sewed together into long strips. Where such "letting-out" is required, the first sewing occurs in the reconstruction of individual skins. The next process is to sew a number of whole, or reconstructed skins, into plates or pieces sufficiently large for a section of a garment. Finally, the sections of the garment, such as back, sides, sleeves, etc. are sewed together. This work is done on a specially designed type of sewing machine. In New York City operators are usually men. Especially outside New York City operators may nail and finish garments as well as cut them.

C. Nailers

The Nailer wets the skins and stretches them so that they cover the pattern for the particular garment. The stretching is done by nailing the skins, which at this stage have been sewed into plates, to a board and putting them away to dry. If this operation is performed properly, it requires skill and considerable care. Except in wholesale establishments and the larger custom ones, the nailing is done mostly as incidental work by cutters and operators. In some establishments it is done by shipping clerks and apprentices. After the skins are dry they are then cleaned and ironed. This operation is often spoken of as glazing, and may be performed by the nailer or by glazers, or by others, including even the cutter.

D. Finishers

The most heterogenous group working on fur garments is the finishers. The shell is made by the "cutters" "operators," "nailers," "squarers" who are cutters, and the "closers" who are superior operators. After these individuals have performed their operations upon the garment it goes to the finishing group or department. Here "lining makers," "stayers," "tapers," and "finishers," work upon it. The lining makers cut and sew the cloth lining together; the stayers attach an inner lining to the skins by the use of a "staying machine;" the tapers attach cloth strips around the garment to assist it in holding its shape; finishers prepare the lining, "work-in" the lining to fit the shell and perform other incidental operations such as making pockets and sewing

on buttons. From these workers the garment goes for final cleaning, ironing, glazing and inspection.

E. First and Second Class

Especially in New York City and in those establishments operating under agreements with the union, a further distinction is drawn between first and second class workers. Presumably, this distinction is based mainly on the kind of fur worked upon and to a lesser degree, the productivity of the worker. It has been maintained that wholesale establishments tend to specialize on the basis of furs and this calls for a corresponding specialization on the part of the worker. Thus, for example, some cutters are known as "Mink," "Sable," "Fox," or "Rabbit." First class workers tend to be those specializing on the more valuable furs and the finer garments. Generally, this means skins ranging from Hudson Seal up. Second class workers tend to be those specializing in the making of garments of cheaper furs such as sealine. Even in New York City, most custom furriers do not recognize this distinction. In making a piece plates, a third class worker is recognized in a union agreement.

Outside of New York City, the situation is quite different. In those establishments doing any considerable amount of work, there tends to be some division of labor and usually along craft lines. Where union agreements exist, craft lines are recognized but most of the establishments do not do a considerable amount of new work, and even when repairing and remodeling work is added, their total volume is not sufficient to warrant division of labor on strict craft lines.

A. Cutters

The most clearly defined craft is cutting and in many places the proprietor is the cutter. But whether proprietor or employee, the cutter is likely to perform other work, such as nailing, glazing and operating. Under such circumstances, there is no opportunity to develop the speed that fellow craft workers can develop under more extensive specialization.

B. Multi-Craft Works

Outside of New York City, the individual performing a variety of activities is more characteristic than the specialized craft worker. This is partly due to the quantity of work and partly to the type of it. Small volume of work, of which repairing and remodeling constitute an appreciable part, does not lend itself to craft specialization.

C. Operators

Outside of New York City, and a few other places, the sewing of skins is often done by women. These women do finishing work and may even do cutting in connection with repairing and remodeling jobs. Then too, a different and slower technique of sewing is found in most of these places.

D. Finishers

Finishing work outside of New York City is done almost entirely by women. Whereas about fifty per cent of the finishers reported in New York City were women, ninety per cent of those reported outside of New York City were female workers. For the most part, these finishers are not capable of cutting and operating a complete lining, but are engaged mainly for straight needle work. In some places, the finishers are called "sewers," and are frequently drawn from other branches of the needle trades as occasion demands.

Class of Work

To some extent, outside of New York City craft workers are found divided into classes. Where union agreements exist, first and second classes are generally recognized and sometimes a third class. In some shops as many as four classes of workers are found in a craft. No uniform definitions of class are found even between establishments, to say nothing of between different localities.

The foregoing descriptions seem to justify the following observations:

1. More or less division of labor along craft lines is found throughout the industry.
2. The extent of specialization depends largely upon the volume and kind of work.
3. Craft lines are more clearly drawn in wholesale manufacturing areas, especially in New York City, than elsewhere.
4. The classifications prevailing in New York City are not those prevailing in most places outside of New York City.
5. Both in and outside New York City there is in practice deviation from the classification.
6. If a policy of codal classifications is adopted, its general lines should take into account the existing practices throughout the country.

H. SEASONALITY

Seasonal activities in this Industry arise from four conditions: (1) Climate, (2) Style, (3) Speculative nature of prices, and (4) Credit.

1. Climate

Insofar as climate conditions are responsible for seasonality there are abundant opportunities to anticipate much of the following season's requirements and manufacture at least plates and shells in anticipation of demand, as well as to do repairing and remodeling work. To the extent that such work is done in the off-season the pressure for overtime in season is reduced.

2. Style

The style factor includes both the shape of the garment and the type of fur. So far as shape is concerned, there is reason to believe the importance of style has been much exaggerated. It is true that with the more expensive and distinctly custom-made garments there is a tendency to wait until the Paris styles are given, generally some time in September. From the standpoint of the number of garments made by the Industry as a whole, such exclusively designed garments are in a distinct minority. For the bulk of new garments the style which ends one season tends to be the style which opens the next. Thus, there is a continuity of style which permits the manufacturer to anticipate future requirements with greater accuracy than is generally admitted. It is true that when Paris models have been made available, they have a modifying influence on general styles but it is also true that by this time most manufacturers have sold a large part of their year's goods to the trade. Consequently, the new styles influence only the tail-end work of the manufacturer's season.

In the matter of repairing and remodeling it is often asserted that at least remodeled work cannot be done in the off-season because the fall styles are not then known. Here again the same style conditions exist as with new garments, namely, that except in a comparatively few instances, the style which prevails when most customers want their remodeled garments in the fall, is the style which closed the previous season.

The influence of changing popularity of furs is serious. Furs which are popular this year may not be popular next year. Consequently, if a manufacturer makes plates, shells, garments and trimmings on the basis of the popular fur or furs of the past season he may find himself next season with merchandise which he can move only with difficulty and losses. From this angle it is advantageous for manufacturers to postpone as much of their operation as possible until they have some indication of the popular fur.

3. Speculative Nature of Prices

Prices fluctuate widely for many kinds of skins and for both garments and trimmings made from certain kinds of furs. This comes about through fluctuations in both demand and supply forces. If, in trimmings,

for example, the lynx fur is popular this will tend to boost the price of these skins. Moreover, once a particular fur begins to "take" the demand for it increases very quickly because of the shortness of the season. On the other hand, if badger skins suddenly lose their popularity, a sharp break will occur in prices for this skin. On the other hand, the available quantities of individual furs may fluctuate widely. Thus it is alleged that Manchurian dog skins are dumped on the market at any time and sold for whatever prices can be gotten with no opportunity for anyone to predict when this may happen. Such circumstances tend to detract from other possible advantages which might be gained through extensive manufacturing operations as might otherwise be undertaken in advance of the season.

These fluctuations in prices of skins reflect themselves in the prices and popularity of garments and trimmings made from them. At the same time, sudden increase or decrease in the popularity of a fur has a marked influence on the prices that can be obtained for the finished goods. A manufacturer who happens to be in a line that becomes popular makes a killing, while one whose specialty has fallen in popularity goes into bankruptcy.

4. Credit

An important part of the seasonal problem lies in the credit situation. Many manufacturers, both wholesale and custom, have little, if any, credit facilities. Therefore, they are not in a position to finance the purchase of skins and to pay labor much in advance of the time when they will be reimbursed by their customers. Concerns which do have credit facilities show a more pronounced tendency to do work in the off-season.

This seasonality means that most workers in the Industry have an opportunity to work in it only about four months in a year. However, this does not mean, as many assume by implication, that this is the only opportunity these workers have to obtain employment. At present fur workers with others, may find extreme difficulty in obtaining outside employment but in periods of ordinary employment there are opportunities for supplemental work. Not only do some workers do fur work in the off-season on their own account, but they find employment in other lines of work. It has not been possible to ascertain the extend to which, prior to the depression, fur workers had supplemental employment and income.

Seasonality in this Industry has a bearing on codal regulations in two respects: First, whatever ultimate improvement may occur, at present, seasonality is beyond the control of most establishments and this fact must be taken into account in codal regulations of wages and hours. Second, in allowing for seasonality, it cannot be assumed that ordinarily there is no opportunity for fur workers to obtain supplementary employment.

I. PREVAILING WAGES

Information as to prevailing wages, both hourly and weekly has been obtained through a questionnaire covering 292 establishments with 1983 factory workers during the week of September 24-29, 1934. Some com-

parisons are drawn between the figures so obtained and those obtained by the Census Bureau.

1. Average Hourly Earnings

If the payrolls for factory workers throughout the country, as reported to the Commission, were divided evenly among the workers, each worker would have received 87.4 cents as his average hourly earning. However, more than half the workers did not receive this amount. In fact, half of them received less than 80 cents per hour.

These figures appear to be considerably higher than those found by the Census Bureau for a representative week in October, 1932. Here the average was 61 cents an hour with half of the workers receiving less than 53 cents an hour. Not only is there a two-year difference in time between the periods covered by the Census and the Commission's study, with codal regulations intervening, but the Census figures cover an extremely large portion of workers in retail or custom establishments. Out of a total of 183 establishments with 1005 factory workers, 130 of the establishments with 792 of the workers were in the retail or custom branch of the Industry.

A separation of the establishments in New York City from those outside the city discloses that wages are considerably lower outside than in New York City. Considering all craft workers together, the average hourly earning for New York City is $1.23 as against 65 cents outside. On this basis, outside earnings are 47 per cent lower than in New York City. It also appears that half the workers in New York City received $1.20 or less while half the workers outside received 57 cents or less. In this case, outside rates are 53 per cent lower than New York City rates. The lowest ten per cent of the workers in New York City received $1.00 or less as against 32 cents outside New York City.

In a general way, the Census figures confirm this tendency. Those figures show that the average hourly earnings for a representative week in October, 1929, 1932, and 1933 to be 94 cents, 74 cents, and 78 cents respectively for the Eastern states as against 69 cents, 49 cents and 54 cents for the other states. In these instances, the rates outside the Eastern states are only 27 per cent, 37 per cent and 31 per cent lower respectively than in the Eastern states.

2. Weekly Wages

Much the same tendency is found with weekly wages.

Again, considering all craft workers throughout the country, it appears that their full time weekly wages averaged $32.56, with 50 per cent of the workers getting $31.78 or less. In New York City, the average is $43.70 as against $25.85 outside, and half the workers in New York City receive $42.28 or less compared with $23.33 or less outside.

On the basis of Census data, the average actual weekly earnings for a representative week of October, 1929, 1932 and 1933 were $35.41, $25.95 and $24.32 respectively. Separating Eastern from other states,

the respective averages for Eastern states were $41.11, $31.33 and $29.36 compared with $32.60, $23.23 and $22.93 for the other states.

It appears therefore that in Eastern states, and especially in New York City, wage levels in this Industry are higher than in other parts of the country. Any codal regulation of wages to be effective must take account of such differences.

Further analysis of wage data will found in the Appendix.

J. PREVAILING HOURS

In general, the prevailing hours worked per week are shorter in New York City than is generally the case outside New York City.

In New York City, the predominating time for workers in about 95 per cent of the reporting establishments was 35 hours, while outside New York City the predominating time was 40 hours in about 60 per cent of the establishments and 35 hours in about 30 per cent.

Actual hours worked ranged from less than 20 to more than 50. The average time for all workers, in and outside of New York City, was 35.5. In New York City, 59 per cent of the factory employees were reported as working 35 hours with about 37 per cent working less than 35 hours. This amount of short time may be at least partially explained on the basis of certain minor Jewish Holidays occurring the week the data was covered.

Outside New York City, about the same proportion of factory employees worked 35 hours as worked 40 hours - about 40 per cent in each case. The average hours actually worked outside New York City were 37.7 hours. (See Appendix)

This tendency for New York hours to be longer than the hours outside of New York City has some support from the Census data. Average hours for factory workers in the Retail Fur Trade are considerably lower in the Eastern States than in the other sections of the country. In 1933, the average for the entire country was 40.8. (See Appendix)

These statistical data confirm the observations and testimony presented to the Commission to the effect that outside New York City and some of the larger fur manufacturing cities, in which there are union agreements for 35 hours, the prevailing hours per week are between 40 and 48.

It has also been pointed out to the Commission that the reduction in hours of the National Industrial Recovery Act was relatively greater in many places than in New York City. Thus, in New York City and other places formerly working 40 hours, the reduction to 35 hours was only a 12½ per cent reduction. While for those establishments formerly working 44 or 48 hours and now working 40, a further reduction to 35 would be a total reduction of between 25 and 27 per cent of the original working time. Expressed in terms of cost, the increase in wage costs were relatively less in New York City and other similar places than in those formerly working longer hours.

There are diverse attitudes with respect to overtime allowance, but a fairly uniform course of action is followed. For example, wholesale manufacturers and labor alike in New York City oppose overtime whereas other manufacturers deem overtime essential and in some instances labor agreements recognize this need. Whatever views may be expressed, it appears from a study of codal compliances that when the seasonal pressure arises, overtime is worked despite union agreements or codal regulations.

The foregoing is significant in several respects: (1) There is at present a spread of at least five hours in working time between places in which appreciable fur manufacturing is done. (2) Both in and outside of New York City an appreciable proportion of factory workers were reported as actually working 35 hours during the week covered, 59 per cent in New York City and 39 per cent outside. (3) Codal provisions with respect to working hours cannot be made without regard to wage provisions.

K. MOBILITY

1. Mobility of Establishments

From the standpoint of investment, most establishments in this Industry could move easily from one locality to another, and many of them could move overnight. Actually, such freedom does not exist either because of the nature of their work or the character of their market or the source of material and labor supply.

In New York City, many establishments cannot even leave the heart of the "fur district" advantageously. In a few city blocks, bounded by Twenty-third and Thirty-second Streets on the north and south, by Eighth Avenue and Broadway on the east and west, the bulk of the nation's fur work is done. Indeed most of the work is done in two dozen buildings in this area. It is estimated that ten per cent of the workers in New York City are in one building - 150 West Thirtieth Street. This area includes not only fur manufacturing but fur dealers, offices of dressers and dyers, lining establishments and subsidiary lines such as pointing and head work. As soon as an establishment, especially wholesale, leaves this district, certain disadvantages arise. These vary somewhat with the lines of work done. Manufacturers of cheap lines may find certain advantages in places outside of the fur district or even outside New York City that more than offset the accompanying disadvantages. The location of trimming manufacturing is influenced by the advantage of being near the Coat and Suit Industry.

Outside New York City, most establishments cannot easily leave their present localities. For the most part, these establishments are custom manufacturers, or at least do considerable repairing and remodeling which arises in the local community. Most wholesale garment manufacturing is carried on by concerns with long established places of business. However, many fur trimming establishments can move rather easily.

2. Labor

In a general sense, workers in any branch of the Industry are drawn from a common pool. For example, workers in wholesale establishments may go, at the end of the season in this branch of the Industry, to the custom manufacturing branch whose season is then opening. Furthermore, workers often work for one establishment by day and another by night, especially during the height of a season. However, there is not entire freedom. Many workers specializing in garments are disinclined to do trimming work and many specializing in one grade of fur are reluctant to work on another, especially cheaper, grade. As between individual establishments, there is complete mobility and a very high rate of labor turnover exists in the Industry, especially in New York City.

As between sections of the country, there does not appear to be much mobility. Many New York City workers are reluctant to leave the city and even the "fur district." However, workers do go out of the district and city - preferably to nearby places. Many workers outside the city do not wish to work in the city and many others would be unable to obtain work in the city.

In view of such conditions, it appears that codal regulations are likely to have little influence on mobility of labor between areas, although such regulations might have more influence on mobility between and within branches of the Industry. So far as branches of the Industry are concerned, different codal regulations between areas would affect some branches more than others, and establishments doing some type of work more than those doing other types.

L. COMPLIANCE

State N.R.A. Compliance Officers throughout the country have found insuperable difficulties in enforcing the provisions of the Fur Manufacturing Code because of the impossibility of determining what is manufacturing for stock as distinguished from made-to-order work. The difficulties were enhanced by the fact that difference in hours under the Retail Code and the Fur Manufacturing Code created confusion. Manufacturers claimed to be custom retailers and refused to recognize the Fur Code or "resigned" after signifying compliance. In a measure, this overlapping conflict was found to be the case in New York City where some forty important firms in the heart of the wholesale market claimed they were custom fur manufacturers and as such were entitled to work longer hours than wholesale manufacturers.

These facts furnish force to the view that, from the standpoint of enforcement, the major branches of the Industry must be treated as a unit.

M. STATISTICAL INFORMATION

Statistical information in this Industry is conspicious by its absence. Most individuals engaging in the Industry are not conscious of any common interests of the Industry as a whole, and hence no incentive

has existed for accumulating even elementary trade information. The data obtained by the Commission may be significant, within limits, as a straw indicating tendencies, but it is too inadequate to constitute a factual basis for dealing with many problems of the Industry.

In view of this situation, code recommendations cannot be based solely upon statistical data, but must be supplemented by information obtained from other sources.

S E C T I O N III

SECTION III

RESERVATION BY MR. ATKINS

In view of the questions raised as to the merits of wage classification, Mr. Atkins has undertaken to set forth at this point the problem, as he sees it, of classification and the alternative, a minimum wage.

SECTION III

ISSUES INVOLVED IN CLASSIFICATION

The formal Administrative actions by which the Special Fur Commission was created and its obligations were described at the outset of this report. The Commission has traveled around the United States, holding hearings in all the areas covered by the Industry. As recounted in the fore part of this report, it has collected statistical information, some of which is appended to this report. It has interviewed, personally, literally hundreds of people who are supposed to have an expert knowledge of the Fur Industry.

It is possible to get any number of different decisions out of the evidence and experience of this Commission, each of which will have considerable logic to defend it and each of which can be indicted for its lack of logic.

ZONES OF AGREEMENT

Most of those acquainted with the Fur Industry will agree to the following:

1. The existing Code wages set up by the wholesale manufacturing code are so much out of line with going wages outside of New York City that they cannot be enforced.

2. As far as wholesale fur manufacturing is concerned, New York City dominates the situation. It has not been losing, however, to the outside markets. Rather during the past 10 years there has been an increasing concentration of such manufacturing in New York and an attending loss in manufacturing in other parts of the country.

3. The Industry is observing the entrance of cheap fur coats, sealine in particular, which may introduce a competition with the Cloak and Suit Industry. This Industry may develop outside of New York, if near-by areas are given low wage standards.

4. Wholesale manufacturing involves a production pace which is more strenuous than the work in custom shops, department stores, and specialty shops.

5. The Cloak and Suit Industry through manufacture of fur-trimmed coats may seriously compete with the Fur Industry.

6. There is a marked tendency toward a labor surplus in New York City and a concentration in New York City of highly skilled workers, whereas outside of New York, in most areas, the labor market is tight at the height of the season, labor is less skilled in the main, and production methods are less advanced than they are in New York.

7. In New York City, the department store and, to somewhat lesser extent, the custom manufacturer is in a position to supply more yearly work than the fur manufacturer and that outside of New York employ workers who tend to be employed for a longer interval of time than is the practice in New York.

8. Labor organization in New York is much more effective than it is in the few other scattered cities in which organization either exists or is being attempted. In the main, the Fur Industry outside of New York is an unorganized industry.

9. The existing Code has been almost without any effect whatsoever outside of New York and enforcement of the Code in New York is far from satisfactory.

10. Outside of the New York area there is a greater tendency to continue in employment people of advanced years.

11. The ranges of skill in the various parts of the country vary greatly from place to place; likewise, wages.

12. The classification existing in the New York market is not followed in other markets and there is no consistent classification outside of New York City.

13. The cases where department stores engaged in manufacturing for stock constitute a comparatively few cases.

14. The department store does not compete with wholesale manufacturing, but with the selling function and the repair and remodeling work of the custom shop.

THE ISSUES

The real issues that the Commission has faced have been two:

(1) Whether classified wage schedules should be recommended,

(2) Whether simply a basic minimum wage should be recommended.

This part of the report, therefore, is devoted to a critical analysis of classified wage scales and the possibilities of a basic minimum wage.

GENERAL CONSIDERATIONS

There is room for considerable doubt as to whether classified wage schedules are desirable. The complexity of the Industry makes their determination largely arbitrary and unscientific. They are subject to manipulation by interested groups and drag the authority of the Government into the Industry's quarrels, disputes, and conflicts. The existing classified wage schedules have not been enforced, indicating, perhaps

that classified wage schedules are largely unenforceable short of a degree of coercion which the Government at present either is unwilling or unable to exercise.

It might be concluded, therefore, that wage regulations in the Code should be limited to the establishment of an enforceable basic minimum wage. Support for this conclusion is given in the concluding sections of this report.

THE COMPLEXITY OF THE INDUSTRY

There are two ways of studying the Fur Industry. First, the Fur industry in New York (embracing all types of producers) with the Fur Industry in the country as a whole. Second, the different types of fur producers compared with each other - that is, fur manufacturers as compared to the custom shops and department stores.

WHOLESALE MANUFACTURING IN NEW YORK

Wholesale manufacturing is characterized by a high degree of seasonality. Although the amount of work varies from season to season, 8, 12, 16 weeks of work has been the lot of most employees in the wholesale manufacturing in the New York market where the manufacturing industry is concentrated.

Not only is work highly seasonal, but the job tends to be brief, after the fashion of the building trades. A worker hired at 9:00 o'clock may find himself discharged at 10:00 the same day. An employer located on the 10th floor wishing a cutter may find one either by going down to the 8th floor, or to a street corner in the wholesale district.

Labor turnover grinds along at a fearful pace even in the active season and, coupled with the ease with which workers can be turned over, the employer, even though under a collective contract, finds it possible to intimidate individual employees into accepting wages and hours that violate union contracts.

Contracting out is rampant and, to the degree that the union presses, the individual employer is under an incentive to resort to contracting. Moreover, individual employees out of jobs solicit work which they perform either in their own homes or in the homes of others, working alone or in combination with their acquaintances.

Contrasted with the outside market and contrasted particularly with the operations in the custom shop and department store, the speed of work in the New York factories is greater. Having access to a large labor supply of the most skilled mechanics in the fur business, management finds it possible to line these men up in a system of production that drives the worker along from cutter to finisher in a dove-tailed series of processes.

The manufacturing unit typically is small. For the fur workers as a whole 40 per cent of the workers according to our figures were in establishments of three or less workers. A room for wholesale manufacturing, 18' x 26', which accommodates eight workers is characteristic. Oftentimes the boss and one or two partners constitute the bulk of the work force. Sometimes this leads to a miniature cooperative in which the workers in effect are owners and share the risks attending ownership.

To this description must be added the fact that the death rate and birth rate of the business enterprise in this Industry is exceedingly high, that financial responsibility in this Industry is such that the bankers approach it with fear and trembling. The worker of today may be the employer of tomorrow and also the worker of the day after tomorrow. Investment in capital equipment is negligible, a shop can be opened on a few hours' notice. To a remarkable extent in this Industry, losing one's job does not mean that he leaves the Fur Industry, but rather that he becomes a self-employer, thus intensifying the competition and making more difficult the successful establishment of labor standards.

NEW YORK CUSTOM WORK

In the custom field in New York, the pace is somewhat slower than in the factory. From the standpoint of arduousness of toil, it is thoroughly possible that a custom worker can work 40 hours with less fatigue than a factory worker can work 35. The work in the custom houses does not involve the division of labor to the extent that it exists in wholesale manufacturing. At the same time, repair and remodeling and high class custom work calls for skill and perhaps a greater variety of skill than is needed in the worker who devoted himself to a single manufacturing operation.

In the provisions proposed for the Fur Code, the custom workers are placed in the same category as the factory worker. This over-lapping classification is based upon the following:

1. There is some interchange of workers between custom and manufacturing work.

2. Although custom work does not call for that kind of skill which makes speed possible, it does call for an all-around craft skill.

3. There is always the possibility that if differing standards are placed upon these two industries in New York City, the manufacturer may allege that he is a custom retailer or the custom retailer may allege that he is a manufacturer. (It is recognized that there are very few manufacturers at present who do not engage in retail business on the side.)

4. The union contract in New York City, insofar as it is effective, applies similar wages to both industries. It should be observed, however, that the unions have always recognized the need of the retailer for some concession on the matter of hours.

DEPARTMENT STORE

Department stores in New York City as a whole are not unionized. Their operations are not greatly dissimilar from those of the custom retailer. Their chief business is repair and remodeling with some occasional custom work. In a few cases, they manufacture some goods for stock. In certain other cases, they contract work out.

The work force in the department store usually is paid less than union wages. The hours of work commonly follow those of the master retail code. The work is varied and the term of employment is much more certain than it is in the manufacturing side of the fur business. Department store executives point out that they have workers who work the year round, some of them get two weeks' vacation with pay. They point out workers who have been with the firm constantly employed for 10, 15, 25 years.

FUR MANUFACTURING OUTSIDE OF NEW YORK

Outside of New York City, there is very little wholesale fur manufacturing. The evidence presented to the Commission indicates that there has been a constant loss of wholesale fur manufacturing from the Boston area, from Buffalo, from the Northwest, from California, and from the Chicago regions to the New York area during the past ten years. The evidence with respect to this transfer has been included in the appendices of this report. In wholesale fur manufacturing, New York concentrates nearly 95 per cent of the manufacturing of the United States. This growing concentration is in sharp contrast with the development in the other needle trades. Moreover, this concentration has occurred despite the fact that for the last 20 years New York has been engaged in dealing with unions and paying union scales on the whole, if anything, more faithfully than they have been paying in the past year.

This trek to New York is to be explained in terms of accessibility to the skin market, accessibility to a large skilled labor reserve, accessibility to the market where buyers concentrate, and the development in New York City of a manufacturing technique which no other part of the country has yet found it possible to equal.

The factual material showing the present dispersion of fur manufacturing is included at the end of this report.

CUSTOM WORK OUTSIDE OF NEW YORK

Custom work outside of New York City presents a sharp contrast both to manufacturing in New York and custom work in New York. Workers are less specialized. The distinction between first and second class cutters, first and second class operators, first and second class nailers, first and second class finishers, exists in few places and where it does exist, it is not defined in the same manner that it is in the New York market. Nailers, as such, outside of New York are practically non-existent. Production methods stand out in sharp contrast. The pace of work is slower. The work is not as routinized as it is in New York.

Perhaps some idea of the situation outside of New York can be secured from considering the observations of our technical expert who investigated shop conditions. Consider but one example: Boston. Boston is a relatively high class and alert production center compared with other parts of the country. Yet in even this case only a relatively small proportion of the workers possess the speed and skill which would enable them to hold comparable jobs in New York City. Specifically, the opinion of our expert was that out of 16 cutters whom he observed at work, 6 could get regular jobs in a New York custom house. The remainder could get jobs helping out the retail at the height of the season only for about $30.00 per week instead of the $50.60 for which a first class cutter in New York qualifies. Watching operators at work and comparing them with New York, it was his opinion that 15 out of 19 observed could qualify for retail work, but none of them for wholesale work. Four out of the 19 he would call apprentices.

Of 41 finishers, 30, according to his judgment, would qualify as second class finishers at the height of the season, and 11 would qualify as tapers. None were really first class finishers. Not, but what they were incapable of good work; rather, they were slow. In summary, our expert adds this significant statement: "They (the Boston furriers) live up to production methods of 20 years ago." Excluding Chicago, this brief thumb-nail sketch of Boston could be followed with comparisons less favorable in almost all the other parts of the country with the exception of a few plants.

One additional point should be added. Whether fur work be custom or department store work or specialty shop work, outside of New York work is likely to be more stable. The shortage of skilled labor makes it necessary for management to maintain a good part of its work force throughout the year and when highly skilled cutters are hired, they commonly are paid even higher wages than are paid in New York City. This is simply testimony to the fact that workers have to be paid to be attracted away from New York.

Surplus labor to take care of a seasonal peak load outside of New York is usually unskilled, casual labor not primarily dependent upon the Fur Industry for a livelihood. At the height of the season, both in the fields of manufacturing, custom and department store work, management finds it necessary to hire seamstresses - old women and young girls who are handy with needles but who know very little about furs, to add to the work force when the pressure for repair and remodeling arises in the fall of the year. These operatives, manifestly incapable of being used in a market like New York, are frequently married and retire from their jobs at the end of the busy season, resume their duties as housewives, some taking an occasional job of dressmaking for their friends or acquaintances.

CLASSIFIED WAGES - PRO AND CON

In view of the complexity of this Industry as described in preceding paragraphs and the policy job which any detailed system of control will involve it is pertinent to raise the question: What is the policy of the N.R.A. with respect to classified wage scheduels?

Since the inception of the N.R.A. it has become the practice in a number of industries, especially in the needle trades, to set up wage scales which classify the workers in a variety of ways. In some cases, the wage differentials are based upon geographic location, in others, they are based upon skill, and in still others, they are based upon a combination of geographic location and skill.

The argument for differentials generally is based upon a number of different things:

1. It is asserted that the cost of living varies widely from one section of the country to another and that the wages which are fixed ought properly to take cognizance of such different costs of living.

2. It is said that it has been customary for many decades to pay different wages in different parts of the country, and that these long established practices of the Industry ought not be lightly disturbed.

3. Perhaps most important, the argument for wage differentials proceeds on the notion that the purpose of the N.R.A. is to lay down conditions upon which different producers may compete fairly. A wage scale which sets one part of the country above another is presumably based on the feeling that the lower wage scale serves as an off-set to the handicaps under which the particular employer may be suffering because of his distance from the market, the availability or the absence of skilled workers, the development of high speed production technique, etc.

Against wage differentials, it can be argued:

1. They are almost invariably highly unfavorable; arrived at unscientifically and in haphazard fashion they reflect far more the pressure of groups seeking to gain special advantage than they do the actual conditions which exist and which should determine the wage differentials, if any.

2. Wage differentials are capable of infinite manipulation. They lend themselves easily to attempts by unscrupulous interests to use them for their own advantage and thus to distort the purpose for which they were laid down.

3. The setting up of wage differentials for a large number of different classes of workers and for a number of different parts of the country, and for a large number of different kinds of producers creates a situation in which, if these wage differentials were to mean anything, an enforcement machinery must be brought into existence which in size and in cost would be prohibitive for the Industry as at present constituted. For wage differentials without enforcement are meaningless.

A realistic view of the history of the Fur Industry leads to the inescapable conclusion that perhaps more than any other industry it is in need of policing if the rules and regulations which have been prescribed are not to be flagrantly violated.

4. If wage differentials are to be justified, they must be based upon such a variety of factors including, for example, the competitive nature of the Industry, the size and efficiency of the different plants, the speed and the skill of the workers, the cost of living, etc. To reach a thoroughly scientific and impartial conclusion from such an imposing list of factors, is a task which is well nigh impossible.

5. Wage differentials are more easily justified in the case of the lowest paid wage earners than in the case of the more skilled workers, since it is presumed that the more highly skilled workers may, by the coercive action of collective bargaining, effect for themselves conditions which to them are more satisfactory.

6. The establishment of a system of classified wage rates which must needs be extremely complex may result in stratification of conditions which, even if reasonable at the present time, would soon become unreasonable and which would as a consequence lead to considerable discontent and often violation.

PROBLEMS INVOLVED IN CLASSIFICATION

In working out a system of classified wages for the various kinds of occupations and the varying degrees of skill and the varying degrees of conditions in the different parts of the country, it may be asked: Are not difficulties being raised which will result in ceaseless protests and ceaseless adjudications if any real attempt is made to enforce such scales?

Classified wage schedules call for:

1. A detailed description of the duties of each item that enters into the classification.

2. It involves a comparison of such items as degree of skill, responsibility, speed of work, degree of supervision involved, the cost of work not performed up to standards, work conditions, the period of time necessary to become a craftsman in the particular line. This should be worked out for each element in the classification, and the comparison should be made between the various items in the classifications.

3. In describing the basis of wage payments, there should be a determined attempt made to avoid any sort of ambiguity. Ambiguities are loop-holes which defeat the purpose of classification. In other words, each classification must be distinct and incapable of confusion with other items which are classified and any regulation with respect to hours and overtime must be in unequivocal language, language which is understandable both to the employer and to the worker. If this is not done any reasonably smart employer can resort to various tricks of reclassification and get around the terms laid down in the Code.

It is questionable whether classified wage schedules supply a satisfactory answer to the problems raised in the preceding paragraphs. In addition, in this Industry in particular, the question is pertinent: Granting that you do define the various classifications and define wages and hours, how can you prevent people from escaping by resource to the various forms of contracting which exist in the Industry?

The Fur Industry at present is shot full through and through with the institution of contracting. New York union wage scales are frequently flaunted in the New York market through a variety of devices and tricks. They exist as realities in those shops where the unions are a real factor, where the unions have power. At the present time, the N.R.A. Code is not the real force controlling wage scales in New York. To the extent that individual craftsmen have skill that is badly needed, and hence possess individual bargaining ability, and to the extent to which the unions possess power, the N.R.A. wage scales have real meaning. (A note on the union situation in New York is included in the appendix of this report.) In other words, primarily it is not the N.R.A. Code that is functioning in New York; the N.R.A. Code has meaning largely to the extent that labor possesses power, and at the present time there is a life and death struggle going on between a right and left wing movement with the employers playing one against the other to the detriment of both.

THE PLATE MAKERS - AN ILLUSTRATION OF CLASSIFICATION

Here are the manufacturers of plates in New York City. The American Fur Plate and Trimming Manufacturers' Association, Inc. has furnished us with a list of 209 firms engaged in this business in the City of New York with the note: "The names of many firms are not included in this list due to the difficulty in locating them. According to our estimation, there are approximately 300 more manufacturers."

The existing Code requires of the plate makers the same standards that are applied to other fur work in New York City, but the plate makers have steadfastly refused to observe the Code terms. They have refused to purchase labels for their merchandise. They have refused to recognize that the Code Authority had power to police them. They feel that they should be granted special terms.

What reasons can be given for establishing a separate classification for plate makers? It can be argued:

1. That plate making does not compete with the fur garment and trimming manufacturing. This is true. Plate making is in competition with skins and skins are outside the review of this study. Therefore, the parties at interest with respect to plate making have not been heard on the question of what should be done with respect to plate-making wages.

2. The plate makers inasfar as they have been organized have, rather consistently, played with the right wing union. This has resulted in developing a friendly attitude toward them on the part of fur interests which have been trying to fight the left wing.

In other words, this group meets with little opposition amongst the fur interests and it is easy to grant them low classified wages. These wages are in the fore part of this report.

$33 for cutters
28 for operators
28 for retailers
23 for finishers

And this is the decision despite the fact that the Code scale in New York City for fur manufacturing is $50.60 for first class cutters, $41.00 for second class cutters; $41.80 for first class operators, $33.20 for second class operators, etc.

But the problem is even more complicated. Insofar as fur plate makers stick to the making of fur plates, they are in competition with the skin trade alone. But inasfar as they make trimmings on coats they are a part of the Fur Industry and in competition with the other branches of the Fur Industry.

So far this practice of making of trimmings, collars, cuffs and scarfs is not widespread; but to the extent to which it does exist, it is a competitive threat to the Trimming Industry which is asked to pay the higher scales. Obviously, the answer is to require that plate people inasfar as they are engaged in trimming work, meet the regular scales. But even such a decision, if made, must recognize the fact that these people do not recognize the Code Authority; they do not contribute to its support; they refuse entrance to inspectors. And always there is the chance to say: "We can't separate plate making from trimming work; the workers do both work." In any case, there arises a real policing job.

Perhaps it should also be placed upon record that the United Fur Manufacturers' Association which claimed 70 members that while Code making proceedings were going on at Washington, they were assured that their demand would be granted but would not be placed in the formal record because, if such an attempt were made, it would hold up proceedings. In other words, they allege something of a gentleman's agreement which is now binding on the N.R.A. Also, it is alleged that in the hearings of January 12 and 13, 1934, "It was agreed by all the representatives of the proponent associations and the Administration officials not to include in the Code the third class minimum rates, preventing thereby any confusion that might result among the out-of-town members of the Industry who are not working on skins."

On the other hand, it is maintained that the representatives of the plate makers were told that the Code would approve any wage schedule proposed by the plate makers which was approved by the President of the International Fur Workers Union. The welter of letters and reported conversations can not be satisfactorily unscrambled, but these things can not be in doubt: The Fur Code on its face does not grant exemption to these people; the fur plate people have refused to abide by the Code as it is written.

In effect, in granting these people third class rates, the decision simply adjusts itself to the fact that the employers in this Industry can not be made to pay first or second class rates. But it illustrates the point that as soon as classifications are set up more classifications are needed; and as more classifications are worked out the basic standards are undermined and nullified.

VARIOUS SYSTEMS OF CLASSIFICATIONS POSSIBLE IN THE FUR INDUSTRY

Despite the fact that classified wages in this Industry will produce a problem immediately of granting exceptions through a rental agency it can be argued:

1. That the N.R.A. should set up a minute classification of wages in the Fur Industry for various classes of workers, not only for unskilled, semi-skilled and skilled, difficult as these terms may be to define, but also for cutters, first and second class; operators, first and second class; nailers, first and second class; finishers, first and second class; general craft workers, finishing assistants and learners, with differing wage scales in different geographical areas, and with a distinction made between wholesale and custom on the one hand, and trimming manufacture on the other.

2. It is possible to arrange a somewhat similar or dissimilar division of crafts and lay down one set of regulations covering fur manufacturing and another set for retailers of furs. Consideration might be given to various groups, particularly the department store, and to a somewhat lesser extent, to the out-of-town custom houses who employ their workers for longer periods of time during the year than the wholesale manufacturing industry commonly does, and who have upon their staff, workers who have had full-time work for years, in contrast to the rather typical six, twelve and eighteen week-employment period in the New York Manufacturing industry. It might be possible also to recognize that the department stores employ old people and, in many cases, give two weeks' vacation with pay, and allot them special considerations on the ground that if they are treated like manufacturing enterprises, they will be forced to discharge some of their present workers. Also, some consideration might be given the fact that the department stores are already operating under retail codes and that standards which apply to them should not seriously interfere with existing setup of hours within their plants.

3. It is possible to compromise on even more simple classification. But to the extent the classification is made less comprehensive, to the extent it will distort and less realistically reflect the variety of conditions in the Industry. In any case, the Fur Industry does not present a simple picture and classification, if attempted in this Industry, cannot be a simple matter.

4. Classifications may be established in terms of some base area, arbitrarily chosen or fixed by successful pressure of an interested group. It should be observed that the wholesale code wrote the

wages of cutters and of the other crafts of the Industry to a high per cent of the New York price. The Commission is agreed that these wages are unworkable. Obedience to the stipulations in New York has been deplorably deficient and outside of New York practically no one has paid any attention to the Code. And this, regardless of the fact that the Code to date applies only to wholesale manufacturers.

All of these variations are possible if classiciation is attempted and all of them could be defended.

CLASSIFIED WAGE SCHEDULES AS A FIGHTING TOOL FOR LABOR

The classified wage schedule recommendations at the outset of this report accept the wages set in the collective contracts between employers and one of the two contending unions located in New York City. It is possible to build the rates for the areas outside of New York City using such contract wages as the base of the pyramid.

Conceivably, such a policy might play into the hands of organized labor who could declare that the employer, when he does not obey code regulations, is not only fighting the union and the union scale demanded (where a union exists) but that the employer is also fighting the Government of the United States.

It is common for organized labor to insist upon nominal wages in collective bargaining contracts during the periods of depression when the going wages are all out of line with what the collective contracts stipulate. Labor feels commonly that there is a psychological value in holding the wages of carpenters, for example, at $1.75 an hour, even though they are actually working at a given moment for 75 cents. Standards on paper in the collective contract may represent especially in time of depression, aspirations and constitute as such an announcement of an intention to get the nominal wages at some future date, as soon as the unions achieve or accumulate power by themselves, or receive it as a legacy from improved industrial conditions.

The Problem of Taking Sides

One need but look at the matter of Federal Relief, concessions to ex-service men, the A.A.A., our banking legislation, and our money manipulation to realize that government is a function of pressure groups. But whether the Government should consciously align itself with any given pressure group in modern society is a real question.

In the case of hours and wages although there may be certain limited areas within which the interests of employers and employees are identical, the intentions and aspirations of workers, both unorganized and organized, in the main are in conflict with the intentions and aspirations of employers unorganized and organized. This is true despite the antagonisms within the groups themselves. Traditionally, the attitude of the Government toward this opposition interest has been to lay down a few rules to the effect that the fighting would be carried on without too much social disorder. The parties at interest have been allowed to fight each other and whatever the result was, it was commonly accepted as the result.

The Government has seldom intervened to coerce either party in any direct fashion. The activities of the Bureau of Labor were largely those of offering mediators to bring the parties together.

It is not the purpose here to pass judgment upon these matters. Whether one thinks the traditional governmental attitude is right or wrong depends upon one's personal philosophy, and that is determined, in most cases, by whether or not one is an employer or an employee. The most disturbing point here is that when a break is made with this traditional attitude, the antagonisms and oppositions which arise multiply in power and effectiveness to the extent which the break with the past is widespread. To this must be added the question of whether classified wage schedules, so proposed in this report, will accomplish what they are intended to accomplish.

STANDARDS AND ENFORCEMENT

While it is thoroughly possible to set standards (1) to serve a fighting weapon in the hands of organized labor, or (2) to bring about a transfer of power to labor, any policy which sets such standards should be adopted only after careful consideration of the problem of enforcement.

If labor standards are set at such a level that 85 per cent of the employers concerned are recognized offenders, (see appended information on compliance) the process will bring into disrepute the whole operation of the N.R.A. as far as the Fur Industry is concerned. On the matter of hours alone and for wholesale fur manufacturing alone, (not custom shops or department stores or specialty shops), there were 1,992 violations in New York City discovered in the period from September 4 to October 12, 1934, a period of but 40 days.

In addition to the cases before the National Compliance Board, at the date this is being written, there are 118 cases pending at 48 Broadway, the New York headquarters of the N.R.A. It is obvious that this process of piling up cases, especially of those in the magistrates' courts cannot go on indefinitely.

At the same time it is thoroughly possible that enforcement in this Industry, especially in New York City, is a function of the nature of the Industry and its members as well as the particular wage scale or scales that may be established. Any control program which seeks to guide the Fur Industry will meet rough going.

On the other hand, however, if standards are set up, standards which are lived up to in 90 per cent of the cases, the recalcitrant 10 per cent can be sat upon which the approval and support of the 90 per cent, which in effect means that the 10 per cent can be disciplined within limits.

Nor should the N.R.A. expect more than this. The N.R.A. can not overnight overcome the opposition arising from the ideas and beliefs not only of business men, but of lawyers, judges, professional people and the great mass of people who have inherited the habits and traditions of society which thinks dominantly in business terms.

LEGAL POWER VERSUS ECONOMIC POWER

The annoying fact that faces one who is interested in protecting labor's interest in matters of this kind is that in regard to enforcing a complicated system of wage standards, government can not achieve the power of a labor union.

Approach a department store in New York City. The union scale which is written in the collective agreement has no meaning to it. For first class cutters, instead of $50.60, they may be paying $34.00, and so on through the list. The union scale calls for 35 hours; they are working 40 and 44 hours. You ask them, "Can't you operate on 35 hours a week?" "Can't you pay union scales?" Their answer is: "We cannot treat our fur workers differently than we treat our other workers on the matter of hours. We cannot pay the wages in the Code and we cannot separate manufacturing operations or repair and remodeling from such busheling operations as attend the sale of a finished garment."

These answers you rather expect. You recognize that any code you draw up with respect to them will be a great inconvenience. You listen while they tell you they do not hire their workers for six or eight months during the year. They hire them all year round, giving them two weeks' vacation with pay. They point to gray-haired workers have have been in their employ twenty to thirty years. They say: "Our conditions are not like those of the Fur Industry on Seventh Avenue.

It is all very true. It is also true that if the union comes along and pulls the shop, the department store will make some sort of arrangement that will meet the demands of the union which for New York City are identical with the code provisions. The sad part of it is that in the absence of the union, little can be done. The N.R.A. cannot pull a shop and must rely on courts and public opinion, both of which agencies have proven inadequate in regard to the Fur Industry, and in New York City the unions have succeeded in unionizing but few department stores.

In the absence of present power union officials can insist on paper scales even though they are not paid. They have some psychological value. For the union official to say: "Yes, we are down and out right now, and the employers are getting away with murder, but we'll get them when times improve," is one thing. It is quite another for the Government to say the rules it has laid down are "down and out" but they will have meaning at some future date.

This Industry, taken as a whole, is not well organized. In New York where the strongest degree of organization exists, and where there exists the greatest possibilities for collective action in the Industry, there is constant warfare between the two groups: The International Fur Workers Union and the Fur Workers International Union, commonly described as the right and left wing, respectively.

Outside of New York, both organizations appear at different spots, and sometimes in the same city, each claiming more power than the other.

At the hearings in New York the Fur Workers International Union claimed to represent 95 per cent of the workers in the New York market.

The International Fur Workers Union claimed to represent 3,000 workers out of the total, generally estimated from 11,000 to 14,000 workers.1/ In any case unionism in this Industry is badly split.

It is thoroughly possible, despite the past history of the social legislation in this country, that the N.R.A. with its provisions for hearings can avoid the due process provisions of the Constitution of the United States. It is not impossible that a wage for the first class cutters in New York City of $50.60 per week for a five-day week of 35 hours can, in the end, run the gamut of the court processes. But it is not certain that they will be enforced short of extended court procedures unless there is developed in this field a strong union organization.

It is a sad fact to those who advocate classified wages, accommodating those who have the highest degrees of skill, that the Government is less powerful than a well-established trade union. In other words, it cannot "pull a shop."

This point of view simply recognizes, whatever may be the wishes of particular groups, that we are still operating a capitalistic society and the N.R.A. must operate within the limits of what is a capitalistic society. It would seem doubtful if much more can be done for the time for the Fur Industry than to set bottoms and those bottoms must be arrived at carefully through a consideration of how high those bottoms can be set and still be achieved.

1/ A letter was sent to both organizations asking each for any evidence they wished to submit in support of their respective claims. The President of the Fur Workers International Union stated that he would recommend a thorough investigation inside the union; he would open all the union books to the Commission, let them look over dues, collections, unemployment insurance, collection, contracts with employers, etc. He suggested that the right wing union send along a representative to point out anything suspicious or misleading, providing that the left wing union was allowed to do the same thing when the books of the right wing were examined. He suggested that their claims could be verified by going to the shops, seeing the shop chairman, etc. The President of the International Fur Workers Union declined to give any information except to reassert the claim made in the hearings that he represented 3,000 workers. He desired to know whether the letter which was sent by the present writer represented his own actions as an individual person or the Commission as a whole. Secondly, the International Fur Workers Union wanted to know for what the information would be used. They claimed that the investigation into unions was outside the proper sphere of the Fur Commission. It is only fair to say that they did not definitely refuse an investigation but apparently wanted assurance with respect to their two questions before they decided.

In the absence of a strong established and recognized unionism, one must recognize that standards and enforcement will be separated to the extent that scales deviate from going wages. If the difference between the going wages and the schedules is great enough, the man who defies the N.R.A. win social approval, and by degrees it is first opposed, then, second completely ignored. The Code provisions is regard to wages and hours constitute just so much description upon sheets of paper.

To those who reply that this description is the counsel of defeat, the reply is that minimum wage for Industry should be written as high above going wages as the N.R.A. can enforce. The N.R.A. should seek all that is possible at the present moment of time and moves forward as the situation justifies it, to ask for more next year and even more in the years to follow. This process is one of ascending, step by step, rather than throwing out the sandbags and mounting into the stratosphere.

SUGGESTED PROGRAM

If the N.R.A. desires to do something along these lines for labor in the Fur Industry, the situation presents these alternatives:

1. Reduce the labor provisions of the codes to the maximum that is administratively possible to achieve.

2. See that labor in this Industry is given all the opportunity to organize and bargain that is provided in Section 7 (a) and (b) of the National Industrial Recovery Act.

3. Openly declare that wages above the union set are to be worked out by collective bargaining.

4. Recognize the right of labor to be represented on any code authority in this Industry.

Public opinion, and by public opinion is meant those attitudes which are commonly reflected in the newspapers, magazines, and radio speeches, can be depended upon to support a minimum wage. It will not support a trade union contract, trade union relations, etc. If these are to be supported they will be supported by the strength of trade unionism.

The experience of other countries does not constitute, of course, the final word in guiding us in our policy in the United States. But perhaps it is not unreasonable to point out here that in neither New Zealand, Germany or Sweden, or in any other industrial country, have steps been taken to establish classified wages. In these cases, the Government functioned in building up a procedure whereby unions could be organized and whereby unions and employers could get together and work out an agreement which was recognized by the Government and became legally binding upon the parties thereto. But the State did not primarily write the agreement, regardless of the parties. First, there was a union.

Unfortunately, in this country, despite the growing collective nature of business activities, it still remains true in many industries that there is not first of all a union of any great importance or any considerable power and prestige among the workers attached to the Industry. In the Fur Industry, we find two unions. Outside of New York unionism is sporadic and in most areas non-existent.

The union scale in many cases has little meaning. Union officials, to get collective contracts, in some cases have made secret concessions. Employers have signed agreements that they knew would not be insisted upon in matters of detail. Contracting to avoid union scales is rampant. Individual agreements by workers to work at less than the scale by the week, and also to accept less than time and one-half for overtime, is admitted to exist. The typical business unit employs two to four workers and both the death and birth rates of business enterprises are exceedingly high. Shops can fold up or open up over night. Workers dis-

charged and even while working, solicit personal work to be done by themselves outside of regular work hours.

Addd to this picture of the so-called unionized part of the Industry, the vast hinterland where organization is practically non-existent, and add to this the fact that for the first time an attempt is being made to control wholesale manufacturing but the custom house, the department store (already under a code) and the specialty shop. These characteristics must be calculated in accepting a complicated series of classified wage schedules for these industries which, although they are related insofar as they deal with furs, have also wide dissimilarities in production methods and personnel problems. Particularly, despite the problems that might be raised there is much merit in the contention of the department stores that they continue in all areas under the Retail Code. Also, the custom can argue for the same treatment. Undoubtedly, to grant such requests means that certain problems will continue to exist but it is also true that in putting them under terms similar to that applying to wholesale manufacturing certain problems will be raised.

In any case it would seem an act of wisdom to attempt to establish only such rules as represent not wishful thinking, but mandates to which the N.R.A. intends, and has the power to compel obedience.

Standards and enforcements are inseparable problems.

CONCLUSIONS

The writer of this report agrees that if it is the policy of the N.R.A. to adopt classified wage schedules for this Industry the scales set up constitute a thoughtful attempt to meet the problems which present themselves in related industries of manufacturing, custom building and the retailing of furs. They attempt to deal with the obvious shortcomings of the existing codal rates of the wholesale manufacturing industry. They suggest a classification of workers and of areas which attempt to take into account the peculiarities of custom building, repairing, and remodeling activities of the custom houses, the specialty shops and the department stores as completely as they can be accommodated by a scheme of classification which groups these industries as one.

However, for the reasons set forth above, the writer doubts the wisdom of attempting to apply classified wage schedules in the Fur Industry.

A P P E N D I C E S

APPENDIX I

FUR MANUFACTURING

Order

CODE OF FAIR COMPETITION FOR THE FUR MANUFACTURING INDUSTRY

Appointing Special Commission as provided in Section 7 of Article IV, and otherwise, of said Code of Fair Competition, and vesting said Commission with certain additional powers and duties.

A Code of Fair Competition for the Fur Manufacturing Industry having been heretofore approved on May 19, 1934, and it being provided in Section 7 of Article IV of said Code, in part, as follows:

" * * * the Administrator shall appoint a Special Commission which shall undertake a study and investigation of the various markets and areas of the Industry and shall, if necessary, conduct hearings in such various markets and areas for the purpose of determining the extent to which (the provisions of this Article, and in particular, the extent to) which the differentials herein established, tend to promote conditions of fair competition between the various markets and areas of the Industry. Said Special Commission on the basis of such study and investigation shall have power to recommend to the Administrator any modification of the provisions of this Article which it may deem necessary to promote conditions of fair competition, including recommendations for the modification of the definitions of the respective areas, recommendations for the creation of new areas, and recommendations for a modification, change, increase or decrease of the differentials between the respective areas. Said Special Commission shall report to the Administrator with its recommendations, as hereinabove set forth, on or before July 1, 1934, and any and all of such recommendations upon approval of the Administrator shall become effective as part of this Code.

"Said Special Commission shall also have such other and further duties and be vested with such other and further powers as the Administrator may from time to time delegate to it, and any such further recommendations, upon the approval of the Administrator, shall also become effective as part of this Code." And

Administrative Order No. 436-3, dated July 3, 1934, having extended the date on which said Special Commission may report with its recommendations from July 1, 1934, to September 1, 1934; and

It appearing that said Special Commission, in addition to the powers and duties specifically conferred upon it by said Section 7 of Article IV and by the other provisions of said Code of Fair Competition may also be conveniently vested with the power and duty of investigating the labor conditions in the related industry engaged in the manufacture of fur articles on a custom basis and in the repairing and remodeling of fur articles directly to the consumer;

NOW, THEREFORE, pursuant to authority vested in me by Executive Orders of the President, and by the Code of Fair Competition for the Fur Manufacturing Industry, I, Hugh S. Johnson, Administrator for Industrial Recovery, do hereby appoint as members of Said Special Commission the following persons:

Dr. Paul Abelson, Chairman
Dr. H. L. Frain
Dr. Willard Atkins

and

ORDER that said Special Commission shall, in addition to its other powers and duties, be vested with the further power and duty of investigating the labor conditions in the related industry engaged in the manufacture of fur articles on a custom basis and in the remodeling and repairing of fur articles directly to the consumer; and I do further

ORDER that said Special Commission shall report to the Administrator with its recommendations on or before September 1, 1934.*

The provisions of this Order may be modified or revoked at any time hereafter.

Hugh S. Johnson
Administrator for Industrial Recovery

Approval Recommended:
William P. Farnsworth
Acting Division Administrator

August 7, 1934

* This date has been extended.

APPENDIX II

SECTION A

STATISTICAL ANALYSIS

I. SIZE OF THE SAMPLE

The attached questionnaire was sent to approximately 10,000 individuals, partnerships and corporations during the week of September 17, 1934. The Commission considered compiling an independent mailing list, but after consulting informed and interested parties, including representatives of custom-retail establishments and of department and specialty stores, it was decided to use a list already compiled by the Wholesale Fur Manufacturing Code Authority. It was deemed probable that in the original compiling of this list an attempt was made to include all establishments doing, or likely to be doing, any fur manufacturing. Replies to the questionnaires indicated that the list did include names of not only fur manufacturing establishments but strictly retail establishments also.

Table I shows for most of the States, and for New York City separately, the number of (1) questionnaires mailed, (2) letters returned unclaimed, (3) unusable replies, and (4) usable replies, whether in whole or in part. It is evident that the country as a whole responded relatively better to the questionnaire than did New York City,---the heart of the Industry. It is also evident that the best response, aside from New York City, came from California.

A total of 410 usable replies were received and these covered 2,145 craft workers. The workers, as shown by Table II, about evenly divide between male and female; 1,130 of the former and 1,015 of the latter. However, the proportion of male workers was much larger in New York City than in the rest of the country. In New York City about 80 per cent were male as against about 40 per cent outside the city.

Not all 410 establishments gave sufficiently complete and definite information to be usable on all the points here considered. On wages the data of only 292 establishments were usable, and on dollar volume of business, 388. Out of the 2,145 workers covered, the information relating to 1,983 of them were usable in the analysis of hourly earnings and 1,933 in the analysis of full-time weekly earnings. Table II gives the number and percentage of firms and of craft workers, by States and in New York City, covered by usable replies.

The number of workers covered varies widely as between crafts. This is shown by Table III. Approximately 43 per cent are finishers, 22 per cent operators, 18 per cent cutters, 10 per cent nailers, and 7 per cent general. As here used "general workers" are those whose craft activities were not stated with sufficient definiteness to justify classification in one of the recognized crafts. It is probable that most of these general workers are actually finishers.

More of the workers covered by the replies are outside New York City than are inside. About two-thirds are outside the City. Within the individual crafts the proportions vary, but only in operating and nailing is the proportion of workers greater in New York City than outside. This is shown by Table IV.

TABLE I

NUMBER OF QUESTIONNAIRES MAILED, UNCLAIMED RETURNS UNUSABLE 1/ AND USABLE REPLIES 2/

	Questionnaires Mailed	Questionnaires Returned Unclaimed	Unusable Replies	Usuable Replies
New York City	4,498	186	85	142
Pennsylvania	625	32	69	28
Illinois	615	23	43	16
California	453	12	38	60
N.Y. (excl. N.Y.C.)	320	17	43	21
Ohio	292	12	54	17
Massachusetts	283	11	19	20
Michigan	256	15	26	7
New Jersey	201	21	9	11
Wisconsin	186	4	23	19
Texas	165	2	26	2
Connecticut	147	4	12	5
Missouri	140	14	22	3
Minnesota	108	3	15	13
Maryland	84	2	13	8
Washington	75	2	14	7
Colorado	54	3	8	4
Iowa	53	3	4	6
Nebraska	44	2	9	3
Other States:				
(4) 75 - 100				
(10) 50 - 74				
(15) 25 - 49				
(2) 24 or less				
Total	1,358	32	204	18
TOTAL	9,861	400	736	410

1/ Among unusable questionnaires were those in which it was claimed no Fur Manufacturing was done.

2/ Usable, in whole or in part.

TABLE II

NUMBER AND PERCENTAGE OF FIRMS AND OF CRAFT WORKERS, BY STATES AND IN NEW YORK CITY, COVERED BY USABLE REPLIES TO QUESTIONNAIRE

PLACES	Number of Firms Reporting						Number of Craft Workers Covered					
	Number			Percentage			Number			Percentage		
	Total	Wage Data	Volume of Business	Total	Wage Data	Volume of Business	Male	Female	Total	Male	Female	Total
New York City	142	112	124	34.5	38.4	32.0	573	138	711	50.7	13.6	33.1
New York, excluding NYC	21	9	21	5.1	3.1	5.4	13	14	27	1.2	1.4	1.3
California	60	48	57	14.7	16.4	14.7	120	208	328	10.6	20.5	15.3
Pennsylvania	28	14	28	6.8	4.8	7.2	54	72	126	4.8	7.1	5.9
Massachusetts	20	18	19	4.9	6.2	4.9	92	75	167	8.1	7.4	7.7
Wisconsin	19	13	19	4.7	4.4	4.9	29	48	77	2.6	4.7	3.6
Ohio	17	14	16	4.1	4.8	4.1	23	28	51	2.0	2.8	2.4
Illinois	16	11	16	3.9	3.8	4.1	21	34	55	1.9	3.3	2.6
Minnesota	13	7	13	3.2	2.4	3.4	60	116	176	5.3	11.4	8.2
New Jersey	11	3	11	2.7	1.0	2.8	7	1	8	0.6	0.1	0.4
Maryland	8	7	7	2.0	2.4	1.8	16	18	34	1.4	1.8	1.6
Michigan	7	6	9	1.7	2.0	2.3	43	104	147	3.8	10.2	6.8
Washington	7	4	7	1.7	1.4	1.8	19	33	52	1.7	3.2	2.4
Iowa	6	6	6	1.5	2.1	1.6	13	25	38	1.2	2.5	1.8
Colorado	4	4	4	1.0	1.4	1.0	9	19	28	0.8	1.9	1.3
Nebraska	3	1	3	0.7	0.3	0.8	6	16	22	0.5	1.6	1.0
Other	28	15	28	6.8	5.1	7.2	32	66	98	2.8	6.5	4.6
TOTAL	410	292	388	100.0	100.0	100.0	1130	1015	2145	100.0	100.0	100.0

TABLE III

NUMBER AND PERCENTAGE OF CRAFT WORKERS COVERED BY QUESTIONNAIRE REPLIES

Craft	Number	Percentage
Cutter	365	18.4
Operator	426	21.5
Nailer	198	10.0
Finisher	855	43.1
General	139	7.0
Total	1,983	100.0

TABLE IV

NUMBER AND PERCENTAGE OF WORKERS COVERED BY QUESTIONNAIRE REPLIES IN AND OUTSIDE NEW YORK CITY, BY CRAFTS

Crafts	Number			Percentage		
	New York City	Outside New York City	Total	New York City	Outside New York City	Total
Cutter	122	243	365	33.4	66.6	100.0
Operator	238	188	426	55.9	44.1	100.0
Nailer	112	86	198	56.6	43.4	100.0
Finisher	199	654	855	23.3	76.7	100.00
General	23	116	139	16.5	83.5	100.0
Total	694	1,289	1,983	35.0	65.0	100.0

II. WAGES

Many or few generalizations may be drawn from the wage data, depending upon the extent to which the material is deemed representative. For the present purpose it is sufficient to draw attention to a few major points.

First, hourly earnings in this Industry are higher on the basis of the Commission, than of the Census, data.

Second, hourly and weekly earnings during the season are considerably lower outside New York City than in New York City.

Third, cutters tend to be the highest and finishers the lowest paid, with operators tending to fall next to cutters, and nailers just above or on a par with finishers.

Fourth, a minimum rate of 40 cents an hour, as provided in many codes, would raise apparently between 10 per cent and 20 per cent of the workers outside New York City, and less than 10 per cent in New York City, although as between crafts the proportions vary.

Hourly earnings for craft working during the week of September 24-29, 1934 averaged 87 cents with 50 per cent of the workers getting 80 cents or less. On the basis of the Census data for a representative week in October, 1929, 1932 and 1933, the average hourly earnings were 69 cents, 49 cents, and 54 cents, respectively.

Weekly earnings on a full-time basis in September, 1934, averages $32.56 with 50 per cent of the workers getting $31.78 or less. Census averages for the years 1929, 1932 and 1933 were $32.60, $23.23, and $22.93, respectively. These and similar figures for individual crafts are given in Table V.

Not only are the average earnings higher but the general level of hourly earnings is higher, on the basis of the Commission's data than is shown by the Census data for a representative week in October, 1932. The basis for this generalization is given in Table VI, and Chart I, by a cumulative percentage distribution of hourly earnings on a "less than" basis.

A further analysis of Census Data, as shown by Tables VIII-A and VIII-B indicates that the general level of earnings in the retail branch of the industry is lower than in the wholesale.

At least three differences may be noted in the circumstances surrounding the collection of these two sets of data. While the Commission's data cover a specific week in September, 1934, the Census data cover a representative week in three of the four immediately preceding years—1929, 1932 and 1933. Second, the Census years are pre-code years; Third, while both sets of data cover retail or custom and wholesale establishments, the Census data are influenced more by retail establishments than are the Commission's data. With a total of 183 establishments and 1,005 workers, 160 establishments and 792 workers are classed under the Retail Trade as shown by Table VII.

TABLE V

MEASURES OF CENTRAL TENDENCY AND DISPERSION OF AVERAGE HOURLY AND FULL-TIME WEEKLY EARNINGS IN AND OUTSIDE NEW YORK CITY BY CRAFTS AS SHOWN BY REPLIES TO COMMISSION'S QUESTIONNAIRE AND FOR AVERAGE HOURLY AND ACTUAL WEEKLY EARNINGS OF ALL FUR FACTORY WORKERS AS SHOWN BY CENSUS DATA

	Questionnaire Replies (1)													Census (2)		
	Cutters		Operators		Nailers		Finishers		General		Combined			All Fur Factory Workers		
	New York City	Outside	New York City	Outside	New York City	Outside	New York City	Outside	New York City	Outside	New York City	Outside	Total	1933	1932	1929
Number of Workers	122	243	238	188	112	86	199	656	23	116	694	1289	1983	770	705	918
	Average Hourly Earnings (in cents)															
Average (3) (Arithmetic)	154	104	124	68	118	66	112	55	108	65	123	68	87	54	49	69
Median (4)	145	114	120	62	114	62	110	50	114	49	120	57	80	—	—	—
Mode (5)	145	105	125	65	115	65	115	45	125	35	115	45	45-115	—	—	—
Range (6) (Entire)	94-218	42-212	69-200	26-137	86-115	30 115	34 200	26-210	41-135	25-210	34-218	25-212	25-218	—	—	—
Range (7) (Central 80%)	120-195	60-147	100-143	40-100	113-134	40-92	88-127	37-75	80-130	31-100	100-156	37-105	40-141	—	—	—
	Average Weekly Earnings (in dollars)															
	Full Time													Actual Time		
Average (3) (Arithmetic)											43.70	25.85	32.36	22.93	23.23	32.60
Median (4)											42.28	23.33	31.78	—	—	—
Mode (5)											42.50	17.50	17.50 and 42.50	—	—	—
Range (6) (Entire)											12.00 – 137.00	10.00 – 122.00	10.00 – 137.00	—	—	—
Range (7) (Central 80%)											33.00 – 52.00	16.00 – 40.00	16.00 – 50.00	—	—	—

(Footnotes on following page)

Special Fur Commission
Division of Research and Planning
A.F.D

TABLE V (Continued)

(Footnotes).

1. Establishments were requested to report wage data for week of September 24-29, 1934.

2. Confidential Report of the Bureau of the Census and the National Recovery Administration: Fur Manufacturing Industry, March 2, 1934. Data cover a representative week in October of 1929, 1932, and 1933.

3. Averages of Census data computed from number of workers, total men-hours and total weekly earnings.

   Fur Commission's questionnaire requested that overtime hours and wages be reported separately. Omitting overtime, an average hourly earning or rate was computed for each worker. From a frequency distribution of these averages, was computed the composite averages in this Table. Hence they are weighted averages of averages. Full-time weekly earnings for individual workers was obtained by multiplying the average hourly earnings by the regular time of the establishment. Outside New York City regular and actual time correspond quite closely, while in New York City there was considerable short time, probably accounted for in part by a minor Jewish holiday during the week covered.

4. Median hourly and weekly earnings computed from original data in 1 cent and $5.00 intervals, respectively.

5. Modal hourly and weekly earnings are mid-points of 10 cents and $5.00 intervals, respectively.

6. Entire range of hourly and weekly earnings taken from original data with 1 cent and $1.00 intervals.

7. Range for central 80 per cent of cases taken from original data with 1 cent and $1.00 intervals.

There is a very pronounced and persistent tendency for earnings to be considerably lower outside New York City than in it. The average hourly earning in New York City, as shown by Table V, is $1.23, as against $.68 outside; the predominating earning in New York City of $1.15, as against $.45 outside, and 50 per cent of the workers in New York City receive $1.20 or less while the same proportion outside receive $.57 or less.

This tendency is further suggested by the Census data for 1929, 1932 and 1933. Average hourly earnings based on these date have been computed and are shown in Table VIII. There it appears, for example, that in the Eastern States, which of course include New York City, the average hourly earnings of all factory workers in 1933 were $.78 and the next highest was $.63 in the Western States; Midwestern States averages $.54 and Southern States, $.47.

With individual crafts the tendency continues as shown by Table V. For example, cutters in New York City had an average of $1.54 as against $1.04 outside; operators $1.24 as against $.68; nailers $1.18 and $.66; finishers $1.12 and $.55.

It will also be noticed that in the four major crafts the average, median and modal, fall within a range of from $.02 to $.10. Cutters in New York City have an average of $1.54, a median of $1.45 and a mode of $1.45 -- the maximum difference being $.09, while outside New York City the respective figures are $1.04, $1.14 and $1.05 -- a maximum difference of $.10. For operators in New York City the corresponding figures are $1.24, $1.20 and $1.20, while outside they are $.68, $.62 and $.65. For nailers, $1.15, $1.14 and $1.15 in New York City and $.66, $.62 and $.65 outside. For finishers, $1.12, $1.10 and $1.15 in New York City and $.55, $.50 and $.45 outside.

In view of the pressure of time and the necessity for hand analysis of questionnaires it was deemed expedient to omit a similar analysis of weekly earnings. Moreover, the significance of full-time weekly earnings is rather doubtful unless full account can be taken of the differences in regular or customary working time, and the total number of cases so available was too meager to give significant results.

Not only do the several measures of central tendency suggest substantially different wage level in and outside New York City, but an examination of the distribution of earnings confirms the observation.

An analysis of the distribution of rates discloses first that the lowest and highest paid workers outside New York City get less than their corresponding groups in New York City. Outside rates go lower and do not rise as high as in New York City. Table V gives the entire rate of average hourly earnings by crafts, and also the range for the central of 80 per cent of the workers. If, for example, the lowest paid 10 per cent and the highest paid 10 per cent of the cutters are excluded, it appears that in New York City the central 80 per cent receive average hourly earnings running from $1.20 to $1.95 while outside the earnings run from

$.60 to $1.47. In New York City operators range from $1.00 to $1.43 and outside from $.40 to $1.00; nailers from $1.13 to $1.34 in New York City and from $.40 to $.92 outside; finishers go from $.88 to $1.27 in New York City and from $.37 to $.75 outside.

Furthermore, the entire level of hourly earnings is lower outside than in New York City. This is shown by Charts II and III. Chart I gives the non-cumulative percentage distribution and Chart II the cumulative percentage distribution, on a "less than" basis, of average hourly earnings by crafts and for the crafts combined. Tables IX-A, IX-B and IX-C give, in 10 cent intervals the number, non-cumulative percentage and the cumulative percentage distribution respectively, of average hourly earnings while Tables X-A, X-B and X-C give similar information in 15 cent intervals.

On the basis of Census data for the retail or custom wholesale branches of manufacturing, the general level is lower in the retail than in the wholesale branch. This is shown by Table XI, which gives the distribution of average hourly earnings in the retail branch by major sections of the country, and by cities in the wholesale branch.

In forming codal provisions with respect to wages it is likely to be helpful to know the earnings of different proportions of the workers in a group. Table XII gives the decile distribution of average hourly earnings. According to this Table the lowest paid 10 per cent of the cutters in New York City received $1.14 or less; the lowest 20 per cent received $1.28 or less; the lowest 30 per cent received $1.43 or less, and so on. Outside New York City the lowest 10 per cent had averages of $.60 or less, the lowest 20 per cent had $.87 or less and the lowest 30 per cent had $1.00 or less.

Before passing to a consideration of weekly and yearly earnings a passing observation may be made with respect to finishers. The general average for these workers was 68 cents, with $1.12 in New York City and 55 cents outside. Further analysis indicates that female workers are relatively more numerous outside than in New York City and 92 per cent outside. Table XIII shows the distinctly large difference in the wage level of these workers in and outside New York City. In the city the predominating hourly earning is $1.15 as compared with 45 cents outside, or about 40 per cent less. Viewed a little differently, virtually all (99.5 per cent) of those outside received less than $1.00 an hour while only 40 per cent of those in the city received less than this.

With weekly earnings the tendency is the same as with hourly earnings, despite variations in the hours worked per week. Table XIV shows that whereas 57 per cent of the workers outside New York City received less than $25.00, only 2 per cent in the city received less than this. Furthermore, while 95 per cent of those outside received less than $40.00 this was the case with only 35 per cent in the city. Chart IV shows this situation graphically by giving the cumulative percentage distributions of full-time weekly earnings.

The Commission made no attempt to collect information as to yearly earnings. The only available material appears to be that of the Census covering the retail and wholesale trade for the years from 1923 to 1933. Averages have been computed from these data and are shown in Table XV. It appears that in retail establishments doing manufacturing work the yearly averages in 1933 run from $292 to $1,144 while in wholesale establishments the earnings run from $277 to $2,102. Viewing these earnings for all the years there is a distinct tendency for the wholesale earnings to be higher than retail earnings. For example there is not a single instance of retail earnings averaging $2,000, while there are four such instances in the wholesale trade.

TABLE VI

DISTRIBUTIONS OF AVERAGE HOURLY RATES FOR FACTORY WORKERS IN THE FUR TRADE AS SHOWN BY CENSUS DATA FOR REPRESENTATIVE WEEK IN OCTOBER, 1933, AND BY SPECIAL FUR COMMISSION DATA, WEEK OF SEPTEMBER 24-29, 1934.

	NUMBER		PER CENT			
			Non-Cumulative		Cumulative (less than basis)	
	Census	Commission	Census	Commission	Census	Commission
Under 20¢	47	-	4.7	-	4.7	-
20-29.9	101	14	10.0	.7	14.7	.7
30-39.9	164	131	16.3	6.6	31.0	7.3
40-49.9	153	292	15.2	14.7	46.2	22.0
50-59.9	118	222	11.7	11.2	57.9	33.2
60-69.9	53	169	5.3	8.5	63.2	41.7
70-79.9	57	165	5.7	8.3	68.9	50.0
80-89.9	40	100	4.0	5.0	72.9	55.0
90-99.9	59	51	5.9	2.6	78.8	57.6
100 and over	213	839	21.2	42.4	100.0	100.0
TOTAL	1005	1,983	100.0	100.0	100.0	100.0

Source: Confidential Report for the Bureau of the Census and the National Recovery Administration, March 2, 1934.

TABLE VII

NUMBER OF ESTABLISHMENTS FROM WAGE DATA AND OF FACTORY WORKERS COVERED BY CENSUS DATA FOR REPRESENTATIVE WEEK IN OCTOBER, 1932, AND BY COMMISSION DATA FOR WEEK OF SEPTEMBER 24-29, 1934

	CENSUS										COMMISSION		
	RETAIL					WHOLESALE							
	Eastern	Mid-Western	Western	Southern	Total	New York	Minneapolis St. Paul	Miscellaneous	Total	Combined Total	NYC	Outside NYC	Combined Total
Number of Establishments	62	67	18	13	160	16	3	4	23	83	112	180	292
Number of Workers	251	407	69	65	792	174	20	19	213	1,005	711	1,434	2,145

TABLE VIII

AVERAGE HOURLY AND WEEKLY EARNINGS FOR MALE, FEMALE AND TOTAL FACTORY WORKERS IN RETAIL FUR TRADE BY MAJOR SECTIONS OF THE COUNTRY, 1929, 1932, and 1933.

Average Hourly Earnings

States	No. of Estab	1929 M	1929 F	1929 Total	1932 M	1932 F	1932 Total	1933 M	1933 F	1933 Total
Eastern	53	$ 1.20	.73	.94	.93	.58	.74	.97	.63	.78
Mid-West	57	.91	.59	.73	.64	.39	.50	.71	.43	.54
Western	15	.62	.73	.70	.60	.60	.60	.67	.62	.63
Southern	11	.76	.33	.45	.52	.25	.33	.69	.38	.47
Combined	136	.98	.62	.77	.72	.45	.56	.80	.49	.61

Average Weekly Earnings

Eastern	53	$53.45	31.19	41.11	39.77	25.25	31.83	36.74	23.46	29.56
Mid-West	57	46.28	25.93	33.82	30.89	18.53	23.59	30.77	18.23	22.92
Western	15	29.09	33.11	32.05	26.00	27.85	27.43	26.54	25.16	25.47
Southern	11	41.65	17.67	24.27	27.18	12.90	17.09	26.59	15.51	18.76
Combined	136	47.70	27.62	35.41	33.64	20.83	25.95	32.63	20.11	24.92

Number of Workers

Eastern	53	134	167	301	101	122	223	113	133	246
Mid-West	57	183	289	472	152	219	371	153	256	409
Western	15	22	61	83	12	41	53	13	44	57
Southern	11	17	45	62	17	41	58	17	41	58
Combined	136	356	562	918	282	423	705	296	474	770

TABLE IX-A

DISTRIBUTION OF AVERAGE HOURLY RATES IN AND OUTSIDE OF NEW YORK CITY BY CRAFTS, SEPTEMBER 24 - 29, 1934 (10¢ Intervals)

Average Hourly Rates (in cents)	Cutters		Operators		Nailers		Finishers		General		Total	
	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC
Under 20¢												
20 - 29.9				1				8		5	-	14
30 - 39.9				8		7	2	80		34	2	129
40 - 49.9		7		30		11	1	222	2	19	3	289
50 - 59.9		13		34		18	1	141		15	1	221
60 - 69.9		18	1	40		17	0	84		9	1	168
70 - 79.9		22	0	34		16	5	80		8	5	160
80 - 89.9		22	7	12	1	8	20	24	4	2	32	68
90 - 99.9	1	14	2	6	2	2	8	8	1	7	14	37
100 - 109.9	5	48	43	16	21	6	29	8	2	9	100	87
110 - 119.9	6	36	44	5	48	1	86		3	3	187	45
120 - 129.9	15	25	83		23		33		8	1	162	26
130 - 139.9	1	4	12	2	8		2		3		26	6
140 - 149.9	42	14	29		9		6				86	14
150 - 159.9	23	9	7				1				31	9
160 - 169.9	2	3	2				1			2	5	5
170 - 179.9	11	3	3								14	3
180 - 189.9	3	3	0								3	3
190 - 209.9	6	1	5				4				15	1
210 & Over	7	1						1		2	7	4
Total	122	243	238	188	112	86	199	656	23	116	694	1,289

TABLE IX-B

PERCENTAGE DISTRIBUTION OF AVERAGE HOURLY RATES IN AND OUTSIDE OF NEW YORK CITY BY CRAFTS, SEPTEMBER 24 - 29, 1934 (10¢ Intervals)

Average Hourly Rates (in cents)	Cutters		Operators		Hailers		Finishers		General		Total	
	New York City	Out-Side NYC	New York City	Out-side NYC	New York City	Out-side NYC	New York City	Out-side NYC	New York City	Out-side NYC	New York City	Out-side NYC
Under 20¢												
20 - 29.9				0.5				1.2		4.3		1.1
30 - 39.9				4.2		8.1	1.0	12.2		29.3	0.3	10.0
40 - 49.9		2.9		15.9		12.8	0.5	33.8	8.7	16.4	0.4	22.4
50 - 59.9		5.3		18.1		20.9	0.5	21.5		12.9	0.1	17.2
60 - 69.9		7.4	0.4	21.3		19.8	0	12.8		7.8	0.1	13.0
70 - 79.9		9.1	0	18.1		18.6	2.5	12.2		6.9	0.7	12.4
80 - 89.9		9.1	2.9	6.4	0.9	9.3	10.1	3.7	17.4	1.7	4.6	5.3
90 - 99.9	.8	5.8	0.8	3.2	1.8	2.3	4.0	1.2	4.4	6.0	2.0	2.9
100 -109.9	4.1	19.8	18.1	8.5	18.8	7.0	14.6	1.2	8.7	7.8	14.4	6.7
110 -119.9	4.9	14.8	18.5	2.7	42.9	1.2	43.2		13.0	2.6	27.0	3.5
120 -129.9	12.3	10.3	34.9	0	20.5		16.6		34.8	0.9	23.4	2.0
130 -139.9	.8	1.6	5.1	1.1	7.1		1.0		13.0		3.8	0.5
140 -149.9	34.4	5.8	12.2		8.0		3.0				12.4	1.1
150 -159.9	18.9	3.7	3.9				0.5				4.5	0.7
160 -169.9	1.6	1.2	0.8				0.5			1.7	0.7	0.4
170 -179.9	9.0	1.2	1.3								2.0	0.2
180 -189.9	2.5	1.2	0								0.4	0.2
190 -209.9	4.9	0.4	2.1				2.0				2.2	0.1
210 & Over	5.8	0.4						0.2		1.7	1.0	0.3
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE IX-C

CUMULATIVE PERCENTAGE DISTRIBUTION OF AVERAGE HOURLY RATES IN AND OUTSIDE NEW YORK CITY, BY CRAFTS, SEPTEMBER 24 - 29, 1934. (10¢ Intervals)

Average Hourly Rates (in cents)	Cutters		Operators		Nailers		Finishers		General		Total	
	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC
Under 20¢												
20 - 29.9				0.5				1.2		4.3		1.1
30 - 39.9				4.7		8.1	1.0	13.4		33.6	0.3	11.1
40 - 49.9		2.9		20.6		20.9	1.5	47.2	8.7	50.0	0.7	33.5
50 - 59.9		8.2		38.7		41.8	2.0	68.7	8.7	62.9	0.8	50.7
60 - 69.9		15.6	0.4	60.0		61.6	2.0	81.5	8.7	70.7	0.9	63.7
70 - 79.9		24.7	0.4	78.1		80.2	4.5	93.7	8.7	77.6	1.6	76.1
80 - 89.9		33.8	3.3	84.5	0.9	89.5	14.6	97.4	26.1	79.3	6.2	81.4
90 - 99.9	0.8	39.6	4.1	87.7		91.8	18.6	98.6	30.5	85.3	8.2	84.3
100 - 109.9	4.9	59.4	22.2	96.2		98.8	33.2	99.8	39.2	93.1	22.6	91.0
110 - 119.9	9.8	74.6	40.7	98.9		100.0	76.4	99.8	56.2	95.7	49.6	94.5
120 - 129.9	22.1	84.5	75.6	98.9			93.0	99.8	87.0	96.6	73.0	96.5
130 - 139.9	22.9	86.1	80.7	100.0			94.0	99.8	100.0	96.6	76.8	97.0
140 - 149.9	57.3	91.9	92.9		100.0		97.0	99.8		96.9	89.2	98.1
150 - 159.9	76.2	95.6	95.8				97.5	99.8		96.6	93.7	98.8
160 - 169.9	77.8	96.8	96.6				98.0	99.8		98.3	94.4	99.2
170 - 179.9	86.8	98.0	97.9				98.0	99.8		98.3	96.4	99.4
180 - 189.9	89.3	99.2	97.9				98.0	99.8		98.3	96.8	99.6
190 - 209.9	94.2	99.6	100.0				100.0	99.8		98.3	99.0	99.7
210 & Over	100.0	100.0						100.0		100.0	100.0	100.0

TABLE X-A

DISTRIBUTION OF AVERAGE HOURLY RATES IN AND OUTSIDE OF NEW YORK CITY BY CRAFTS, SEPTEMBER 24 - 29, 1934 (15¢ Intervals)

Average Hourly Rates (in cents)	Cutters		Operators		Nailers		Finishers		General		Total	
	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC
Under 15¢								8		5		14
15 - 29.9		2		1								
30 - 44.9		18		23		11	3	179	2	44	5	259
45 - 59.9		25	1	49		25	1	264	0	24	1	380
60 - 74.9		36	7	55	1	26	3	127	0	12	4	245
75 - 89.9	6	54	33	31	18	15	22	61	4	7	34	150
90 - 104.9	6	45	56	18	53	7	29	15	3	16	89	110
105 - 119.9	15	26	93	9	29	2	94	1	3	3	212	60
120 - 134.9	43	17	31	2	11		34		10	1	181	27
135 - 149.9	24	11	9				7		1		93	19
150 - 164.9	12	4	3				2				35	11
165 - 179.9	3	3	3							2	15	6
180 - 194.9	6	1	2				2				8	3
195 - 209.9	7	1					2				10	1
210 & Over							0	1		2	7	4
Total	122	243	238	188	112	86	199	656	23	116	694	1,289

TABLE X-B

PERCENTAGE DISTRIBUTION OF AVERAGE HOURLY RATES IN AND OUTSIDE OF NEW YORK CITY BY CRAFTS, SEPTEMBER 24 - 29, 1934 (15¢ Intervals)

Average Hourly Rates (in cents)	Cutters		Operators		Nailers		Finishers		General		Total	
	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC
Under 15¢												
15 - 29.9				0.5				1.2		4.3		1.1
30 - 44.9		0.8		12.2		12.8	1.5	27.3	8.7	37.9	0.7	20.1
45 - 59.9		7.4		26.1		29.1	0.5	40.2		20.7	0.1	29.5
60 - 74.9		10.3	0.4	29.2		30.2	1.5	19.3		10.4	0.6	19.0
75 - 89.9		14.8	2.9	16.5	0.9	17.5	11.1	9.3	17.4	6.0	4.9	11.6
90 - 104.9	4.9	22.3	13.9	9.6	16.1	8.1	14.6	2.3	13.0	13.8	12.8	8.5
105 - 119.9	4.9	18.5	23.5	4.8	47.3	2.3	47.2	0.2	13.0	2.6	30.6	4.6
120 - 134.9	12.3	10.7	39.1		25.9		17.1		43.5	0.9	26.1	2.1
135 - 149.9	35.2	7.0	13.0	1.1	9.8		3.5		4.4		13.4	1.5
150 - 164.9	19.7	4.5	3.8				1.0				5.0	0.9
165 - 179.9	9.9	1.7	1.3							1.7	2.2	0.5
180 - 194.9	2.5	1.2	1.3				1.0				1.2	0.2
195 - 209.9	4.9	0.4	0.8				1.0				1.4	0.1
210 & Over	5.7	0.4						0.2		1.7	1.0	0.3
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

TABLE X-C

CUMULATIVE PERCENTAGE DISTRIBUTION OF AVERAGE HOURLY RATES IN AND OUTSIDE NEW YORK CITY, BY CRAFTS, SEPTEMBER 24 - 29, 1934 (15¢ Intervals)

Average Hourly Rates (in cents)	Cutters		Operators		Nailers		Finishers		General		Total	
	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC	New York City	Outside NYC
Under 15¢								1.2		4.3		1.1
15 - 29.9				0.5								
30 - 44.9		0.8		12.7		12.8	1.5	28.5	8.7	42.2	0.7	21.2
45 - 59.9		8.2		38.8		41.9	2.0	67.7	8.7	62.9	0.8	50.7
60 - 74.9		18.5	0.4	68.0		72.1	3.5	88.0	8.7	73.3	1.4	69.7
75 - 89.9		33.3	3.3	84.5	0.9	89.6	14.6	97.3	26.1	79.3	6.3	81.3
90 - 104.9	4.9	55.6	17.2	94.1	17.0	97.7	29.2	99.6	39.1	93.1	19.1	89.8
105 - 119.9	9.8	74.1	40.7	98.9	64.3	100.0	76.4	99.8	52.1	95.7	49.7	94.4
120 - 134.9	22.1	84.8	79.8	98.9	90.2		93.5	99.8	95.6	96.6	75.8	96.5
135 - 149.9	57.3	91.8	92.8	100.0	100.0		97.0	99.8	100.0	96.6	89.2	98.0
150 - 165.9	77.0	96.3	96.6				98.0	99.8		96.6	94.2	98.9
165 - 179.9	86.9	98.0	97.9				98.0	99.8		98.3	96.4	99.4
180 - 194.9	89.4	99.2	99.2				99.0	99.8		98.3	97.6	99.6
195 - 209.9	94.3	99.6	100.0				100.0	99.8		98.3	99.0	99.7
210 & Over	100.0	100.0						100.0		100.0	100.0	100.0

TABLE XI-A

DISTRIBUTION OF AVERAGE HOURLY RATES FOR FACTORY WORKERS IN THE RETAIL AND WHOLESALE FUR TRADE BY SPECIFIED STATES CITIES FOR A REPRESENTATIVE WEEK IN OCTOBER, 1932.

	NUMBER OF FACTORY WORKERS								
	RETAIL TRADE					WHOLESALE TRADE			
Average Hourly Rate (in cents)	Eastern	Mid-West	Western	Southern	Total	New York	Minneapolis St. Paul	Misc.	Total
Under 20¢	-	13	21	13	47				
20-29.9	16	57	5	18	96			5	5
30-39.9	40	91	11	21	163		1	-	1
40-49.9	49	79	14	2	144		8	1	9
50-59.9	24	69	8	2	103	2	7	6	15
60-69.9	16	25	4	-	45	-	1	7	8
70-79.9	16	24	1	4	45	9	3	-	12
80-89.9	14	13	2	2	31	9	-	-	9
90-99.9	24	10	-	1	35	24	-	-	24
100 and over	52	26	3	2	83	130	-	-	130
TOTAL	251	407	69	65	792	174	20	19	213
No. of Establishments	62	67	18	13	160	16	3	4	23

Source: Confidential Report for the Bureau of the Census and the National Recovery Administration, March 2, 1934.

TABLE XI-B

PERCENTAGE DISTRIBUTION OF AVERAGE HOURLY RATES FOR FACTORY WORKERS IN THE RETAIL AND WHOLESALE FUR TRADE BY SPECIFIED STATES AND CITIES FOR A REPRESENTATIVE WEEK IN OCTOBER, 1932

	Retail					Wholesale				
Actual Hourly Earnings	Eastern	Mid Western	Western	Southern	Total	New York	Minneapolis St. Paul	Miscellaneous	Total	Combined Total
Under 20¢		3.2	30.4	20.0	5.9					4.7
20 - 29.9	6.4	14.0	7.2	27.7	12.1			26.3	2.4	10.0
30 - 39.9	15.9	22.4	15.9	32.3	20.6		5	5.3	.4	16.3
40 - 49.9	19.5	19.4	20.3	3.1	18.2		40		4.2	15.2
50 - 59.9	9.6	17.0	11.6	3.1	13.0	1.1	35	31.6	7.1	11.7
60 - 69.9	6.4	6.1	5.8		5.7		5	36.8	3.8	5.3
70 - 79.9	6.4	5.9	1.5	6.1	5.7	5.2	15		5.6	5.7
80 - 89.9	5.6	3.2	2.9	3.1	3.9	5.2			4.2	4.0
90 - 99.9	9.6	2.5		1.5	4.4	13.8			11.3	5.9
100 or more	20.6	6.3	4.4	3.1	10.5	74.7			61.9	21.2
TOTAL	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Number of Establishments										

Source: Confidential Report for the Bureau of the Census and the National Recovery Administration, March 2, 1934.

TABLE XII

PERCENTAGE OF CRAFT WORKERS RECEIVING SPECIFIED AVERAGE HOURLY RATES OR LESS.

Per Cent Of Total Workers.	Cutter		Operator		Nailer		Finisher		General		Total	
	NYC	Out-side	NYC	Out-side	NYC	Out-side	NYC	Out-side	NYC	Out-side	NYC	Out-side
Lowest 10%	$1.14	.60	1.00	.40	1.00	.40	.87	.37	.43	.30	1.00	.37
" 20%	1.28	.87	1.06	.48	1.08	.47	1.00	.40	.86	.35	1.06	.42
" 30%	1.43	1.00	1.14	.53	1.14	.55	1.05	.45	.69	.37	1.10	.46
" 40%	1.43	1.05	1.19	.60	1.14	.57	1.10	.46	1.00	.41	1.14	.51
" 50%	1.45	1.14	1.20	.62	1.14	.62	1.10	.50	1.14	.49	1.20	.57
" 60%	1.51	1.28	1.20	.67	1.14	.67	1.10	.53	1.25	.57	1.20	.65
" 70%	1.57	1.43	1.28	.75	1.20	.71	1.14	.60	1.25	.67	1.28	.75
" 80%	1.71	1.49	1.34	.82	1.28	.79	1.20	.67	1.28	.87	1.43	.87
" 90%	1.85	1.62	1.43	1.00	1.34	.88	1.27	.75	1.28	1.00	1.56	1.04
Total No. of workers	122	243	238	188	112	86	190	656	23	116	694	1289

TABLE XIII
DISTRIBUTION OF AVERAGE HOURLY RATES FOR
FEMALE FINISHERS IN AND OUTSIDE NEW YORK CITY,
SEPTEMBER 24-29, 1934.

Average Hourly Rate (in cents)	Number		Percentages			
			Non-Cumulative		Cumulative (less than)	
	N.Y. City	Out-side	N.Y. City	Out-side	N.Y. City	Out-Side
Under 20¢		2		.3		.3
20-29.9		17		2.8		3.1
30-39.9	1	85	1.1	14.2	1.1	17.3
40-49.9		169		28.2	1.1	45.5
50-59.9	1	139	1.1	23.2	2.2	68.7
60-69.9	1	78	1.1	13.0	3.3	81.7
70-79.9	3	77	3.2	12.8	6.5	94.5
80-89.9	13	24	13.6	4.0	20.1	99.5
90-99.9	4	4	4.2	.7	24.3	99.2
100-109.9	15	5	15.7	.8	40.0	100.0
110-119.9	43		45.2		85.2	
120-129.9	12		12.6		97.8	
130 and over	2		2.2		100.0	
TOTAL	95	600	100.0	100.0		

TABLE XIV

DISTRIBUTION OF FULL TIME WEEKLY WAGES FOR CRAFT WORKERS IN FUR MANUFACTURING INDUSTRY, SEPTEMBER 24-29, 1934.

Weekly Wages (in dollars)	NUMBER			PERCENTAGE					
				Non-Cumulative			Cumulative (less than basis)		
	New York City	Outside NYC	Total	New York City	Outside NYC	Total	New York City	Outside NYC.	Total
$10.00-14.99	9	112	121	1.24	9.29	6.26	1.24	9.29	6.26
15.00-19.99	4	331	335	.55	27.44	17.33	1.79	36.73	23.59
20.00-24.99	2	240	242	.28	19.90	12.52	2.07	56.63	36.11
25.00-29.99	15	191	206	2.06	15.84	10.66	4.13	72.47	46.77
30.00-34.99	53	121	174	7.29	10.03	9.00	11.42	82.50	55.77
35.00-39.99	172	81	253	23.65	6.72	13.08	35.07	89.22	68.85
40.00-44.99	208	64	272	28.61	5.31	14.07	63.68	94.53	82.92
45.00-49.99	102	18	120	14.03	1.49	6.21	77.71	96.02	89.13
50.00-54.99	94	21	115	12.93	1.74	5.95	90.64	97.76	95.08
55.00-59.99	32	14	46	4.40	1.16	2.38	95.04	98.92	97.46
60.00-64.99	13	2	15	1.79	.17	.78	96.83	99.09	98.24
65.00-69.99	5	8	13	.69	.66	.67	97.52	99.75	98.91
70.00-74.99	9	3	12	1.24	.25	.62	98.76	100.00	99.53
75.00 and over	9	-	9	1.24	--	.47	100.00		100.00
TOTAL	727	1206	1933	100.0	100.0	100.0			

TABLE XV

AVERAGE YEARLY 1/ EARNINGS FOR FACTORY WORKERS IN WHOLESALE AND RETAIL ESTABLISHMENTS, BY STATES OR CITIES, 1929-1933 INCLUSIVE

States or Cities	Number of Identical Establishments	Number of Factory Workers 2/	1929	1930	1931	1932	1933
			Retail Fur Trade				
(States)	1	1		$ 720	548	416	292
Eastern	2	3-6			375	547	567
	9	18-31				1,077	1,192
Mid-Western	1	3-10		1,879	1,159	900	1,043
	5	10-15			1,130	1,185	985
	7	17-41				1,191	1,123
Western	1	2-12		519	1,417	1,386	976
	1	1-14			341	319	319
	1	1-2				1,111	1,144
Southern	1	2-6		1,245	1,549	1,196	964
			Wholesale Fur Trade				
New York	7	56-165	1,623	1,267	1,055	1,500	1,653
	1	5-20		2,109	2,280		1,588
	6	27-61				2,228	2,102
	6	14-64					1,472
Minneapolis St. Paul	1	4				971	880
	1	14					896
Miscellaneous	3	9-15	255	232	230	328	277

1/ Yearly Earnings based on "Total wages paid" and "Average number of Factory wage earners." For 1929, 1930 and 1931 the dates are given on yearly basis; for 1932 and 1933 on quarterly basis. In the latter years the average yearly earnings are a total of the weighted quarterly earnings.

2/ Number of factory workers is the lowest and highest average number given yearly in 1929, 1930 and 1931 for identical establishments; while in 1932 and 1933 it is the lowest and highest quarterly average during the period 1932-33.

SOURCE: Computed from "Confidential Report for the Bureau of the Census and the N.R.A.; Fur Manufacturing Industry;" March 2, 1934.

III HOURS

In N.Y.C. 35 hours is the predominating work week, as reported to the commission, and it is also found in some establishments, especially wholesale, outside the city. For the most part establishments outside the city have a 40 hour week, with some 44 and in some cases more.

From Table XVI it appears that about 95% of the establishments in N.Y.C. have a 35 hour week as against 30% outside. A 40 hour week was reported by only 3% of the N.Y.C. establishments as compared with 60% of those outside.

Viewed from the standpoint of workers, rather than establishments, the actual time for 59% of the N.Y.C. workers and 39% of those outside was 35 hours, while only 3% of those in N.Y.C. as compared with 42% outside worked 40 hours.

The prominence of short time in N.Y.C. may be accounted for, at least in part, by minor holidays. The survey was postponed several weeks to avoid major Jewish Holidays and it would have been extended several more weeks if all such holidays were to be avoided.

Census data, as shown in Table XVII shows a persistent tendency for average hours to be lower in the Eastern states than in the other groups of states. Thus in 1933 Eastern states averaged 37.7 hours as against 42.7, 40.2 and 40.3 for Mid-western, Western and Southern states respectively.

From this table it also appears that a reduction in hours occurred between 1932 and 1933. As between 1929 and 1932 hours remained substantially the same, but for the industry as a whole the average fell from 46 in 1929 and 1932 to about 41 in 1933.

TABLE XVI

DISTRUBUTION OF WORKING TIME PER WEEK IN AND OUTSIDE NEW YORK CITY BY NUMBER OF ESTABLISHMENTS AND BY NUMBER OF CRAFT WORKERS SEPTEMBER 24-29, 1934.

Hours Per Week	Predominating Time of Establishments				Actual Time of Craft Workers			
	Number		Percentage		Number		Percentage	
	New York City	Out side NYC	New York City	Out side NYC	New York City	Out side NYC	New York City	Out side NYC
Under 20					87	27	12.1	1.9
20-24.9					29	26	4.0	1.8
25-29.9					76	19	10.5	1.3
30-34.9					74	34	10.3	2.4
35-35.9	70	51	94.6	29.5	426	554	59.2	38.7
36-37.9		2		1.1		14		1.0
38-39.9					3	5	.4	.3
40-40.9	4	103	5.4	59.6	24	601	3.3	41.9
41-42.9		4		2.3		38		2.6
43-44.9		11		6.4	1	73	.1	5.1
45-46.9						5		.3
47-48.9		2		1.1		31		2.2
49-50-9						3		.2
51 and over					1	4	.1	.3
TOTAL	74	173	100.0	100.0	721	1434	100.0	100.0

TABLE XVII

AVERAGE WEEKLY HOURS OF MALE, FEMALE, AND TOTAL FACTORY WORKERS IN THE RETAIL FUR TRADE, BY MAJOR SECTIONS OF THE COUNTRY, 1929, 1932 AND 1933

(Data Covers Month of October)

States	Number of Identical Establishments	Average Weekly Hours 1/								
		1929			1932			1933		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Eastern	53	44.5	42.9	43.6	42.9	43.2	43.0	38.1	37.4	37.7
Mid-Western	57	51.1	43.8	46.6	48.4	46.9	47.5	43.2	42.4	42.7
Western	15	47.1	45.4	45.9	43.5	46.3	45.7	39.8	40.3	40.2
Southern	11	54.9	53.1	53.6	52.1	51.8	51.9	38.6	41.0	40.3
Combined	136	48.5	44.5	46.0	46.5	46.2	46.3	40.8	40.7	40.8
		Number of Factory Workers								
Eastern	53	134	167	301	101	122	223	113	133	246
Mid-Western	57	183	289	472	152	219	371	153	256	409
Western	15	22	61	83	12	41	53	13	44	57
Southern	11	17	45	62	17	41	58	17	41	58
Combined	136	356	562	918	282	423	705	296	474	770

1/ Based on payroll week representative of October.

Source: Computed from "Confidential Report for the Bureau of the Census and N.R.A." Fur Manufacturing Industry; March 2, 1934.

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IV. SIZE OF ESTABLISHMENTS

Viewed from the standpoint of the number of workers, the industry is predominately small scale both in and outside N.Y.C. Table XVIII indicates that for the industry as a whole 40% of the establishments have 3 or less workers and 70% have 7 or less. Only about 3% of the establishments have 20 or more. These proportions tend to hold both in and outside N.Y.C. The similarity between the size of establishments in and outside N.Y.C. is shown graphically in Chart V.

The size of establishments as shown by Census data covering the retail trade is approximately that disclosed by the Commission's inquiry. The Commission found the average size of establishments to be 7.4 workers as compared with 5.6 shown by the Census survey. Table XIX gives the averages computed from Census data for major sections of the country in a representative week of October 1929, 1932 and 1933.

This same tendency to smallness is shown by an analysis of the dollar volume of fur manufacturing, although here establishments outside N.Y.C. show a tendency to be smaller than those reported in N.Y.C. The cumulative percentage distribution in Table XX shows that while 15% of the establishments in N.Y.C. did less than $6,000 worth of manufacturing in 1933, this was the case with 30% of those outside. In the city 23% did less than $10,000 as compared with 47% of the establishments outside, as while half of those in the city did less than $30,000 about 82% of t those outside did less than this amount.

TABLE XVIII

SIZE OF FUR MANUFACTURING ESTABLISHMENTS BY NUMBER OF CRAFT WORKERS
September 24-29, 1934

Number of Craft Workers	Number and Percentage of Establishments								
	Number			Percentage					
				Non-Cumulative			Cumulative (Less Than)		
	New York City	Outside NYC	Total	New York City	Outside NYC	Total	New York City	Outside NYC	Total
1	8	31	39	7.14	17.22	13.36	7.1	17.2	13.4
2	16	24	40	14.28	13.33	13.70	21.4	30.6	27.1
3	23	16	39	20.54	8.89	13.36	42.0	39.4	40.4
4	7	17	24	6.25	9.44	8.22	48.2	48.9	48.6
5	5	9	14	4.46	5.00	4.79	52.7	53.9	53.4
6	11	16	27	9.82	8.89	9.25	62.5	62.8	62.7
7	8	12	20	7.14	6.67	6.85	69.6	69.4	69.5
8	6	2	8	5.36	1.11	2.74	75.0	70.6	72.3
9	6	5	11	5.36	2.78	3.77	80.4	73.3	76.0
10-14	14	24	38	12.50	13.33	13.01	92.9	86.7	89.1
15-19	4	12	16	3.57	6.67	5.48	96.4	93.3	94.5
20-24	2	6	8	1.79	3.33	2.74	98.2	96.7	97.3
25-49	2	3	5	1.79	1.67	1.71	100.0	98.3	99.0
50-74	-	2	2	-	1.11	0.68	-	99.4	99.7
75-99	-	-	-	-	-	-	-	-	-
100 and over	-	1	1	-	0.56	0.34	-	100.0	100.0
Total	112	180	292	100.0	100.0	100.0	100.0	100.0	100.0

TABLE XIX

AVERAGE NUMBER OF MALE, FEMALE, AND TOTAL FACTORY WORKERS IN THE RETAIL FUR TRADE BY MAJOR SECTIONS OF THE COUNTRY, 1929, 1932 and 1933.

AVERAGE NUMBER OF WORKERS

Section	No. of Estab.	1929			1932			1933		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Eastern	53	2.5	3.2	5.7	1.9	2.3	4.2	2.1	2.5	4.6
Mid-West	57	3.2	5.1	8.3	2.7	3.8	6.5	2.7	4.5	7.2
Western	15	1.5	4.1	5.5	0.8	2.7	3.5	0.9	2.9	3.8
Southern	11	1.5	4.1	5.6	1.5	3.7	5.3	1.5	3.7	5.3

NUMBER OF WORKERS

Section	No. of Estab.	1929			1932			1933		
		Male	Female	Total	Male	Female	Total	Male	Female	Total
Eastern	53	134	167	301	101	122	223	113	133	246
Mid-West	57	183	289	472	152	219	371	153	256	409
Western	15	22	61	83	12	41	53	13	44	57
Southern	11	17	45	62	17	41	58	17	41	58
TOTAL	136	356	562	918	282	423	705	296	474	770

TABLE XX

SIZE OF FUR MANUFACTURING ESTABLISHMENTS BY VOLUME OF MANUFACTURING, 1933

Dollar Volume of Manufacturing (000 Omitted)	Number and Percentage of Establishments								
	Number			Non-Cumulative Percentage			Cumulative (Less Than) Percentage		
	New York City	Outside NYC	Total	New York City	Outside NYC	Total	New York City	Outside NYC	Total
Under $1.9	3	16	19	2.42	6.1	4.90	2.4	6.1	4.9
$2 3.9	10	35	45	8.06	13.2	11.60	10.5	19.3	16.5
4 5.9	6	29	35	4.83	10.9	9.02	15.3	30.2	25.5
6 7.9	4	27	31	3.23	10.2	7.99	18.4	40.4	33.5
8 9.9	6	17	23	4.8	6.4	5.93	23.4	46.8	39.4
10 14.9	8	37	45	6.45	14.0	11.60	29.8	60.8	51.0
15 19.9	13	24	37	10.48	9.1	9.54	40.3	69.9	60.6
20 24.9	6	20	26	4.83	7.6	6.70	45.1	77.5	67.3
25 29.9	6	11	17	4.83	4.2	4.38	50.0	81.7	71.7
30 39.9	6	9	15	4.83	3.4	3.86	54.8	85.1	75.5
40 49.9	7	8	15	5.64	3.0	3.86	60.4	88.1	79.4
50 59.9	7	6	13	5.64	2.3	3.35	66.1	90.4	82.7
60 69.9	9	4	13	7.35	1.5	3.35	73.4	91.9	86.1
70 79.9	11	3	14	8.87	1.2	3.61	82.3	93.1	89.7
80 89.9	3	6	9	2.42	2.3	2.32	84.7	95.4	92.0
90 99.9	5	0	5	4.03	-	1.29	88.7	-	93.3
100 124.9	4	2	6	3.23	0.8	1.55	91.9	96.2	94.9
125 149.9	4	2	6	3.23	0.8	1.55	95.2	97.0	96.4
150 174.9	3	4	7	2.42	1.5	1.80	97.6	98.5	98.2
175 199.9	-	-	-	-	-	-	-	-	-
200 and over	3	4	7	2.42	1.5	1.80	100.0	100.0	100.0
Total	124	266	388	100.0	100.0	100.0			

TABLE XXI

VOLUME OF REPAIRING AND REMODELING COMPARED WITH TOTAL VOLUME FOR MANUFACTURING IN NEW YORK CITY, 1933

DOLLAR VOLUME OF REPAIRING AND REMODELING (IN THOUSANDS OF DOLLARS)

	Under 2	2 to 3.9	4 to 5.9	6 to 7.9	8 to 9.9	10 to 11.9	12 to 13.9	14 to 15.9	16 to 17.9	18 to 19.9	20 to 29.9	30 to 39.9	40 to 49.9	50 to 74.9	75 to 99.9	100 to 124.9	125 to 149.9	150 and over	TOTAL
150 and over																		2	2
125-149.9														1					1
100-124.9													1						1
75-99.9												1		1		1			3
50-74.9											1		1		1				3
40-49.9																			-
30-39.9									2									1	3
20-29.9																			-
18-19.9																			-
16-17.9								2	-										2
14-15.9					3		1	1	-	1	-	1		1					8
12-13.9					-		1	-	1	-	-		1	1			1	1	6
10-11.9			3	2	1		1	-	-	-	1	1		2	1			1	13
8-9.9		7	1	-	1		-	-	-	-	-		2	3	2			2	18
6-7.9	3	3	1	-	-		-	-	-	2	-								9
4-5.9	-	-	-	1	1		2	3	1	2	9	3	3	14	8	2	3		52
2-3.9																			
Under 2																			
None																			
TOTAL	3	10	5	3	6	-	5	6	4	5	11	6	8	23	12	3	4	7	121

DOLLAR VOLUME OF TOTAL FUR MANUFACTURING (IN THOUSANDS OF DOLLARS)

TABLE XXI (Cont)

VOLUME OF REPAIRING AND REMODELING COMPARED WITH TOTAL VOLUME FOR MANUFACTURING OUTSIDE NEW YORK CITY, 1933.

DOLLAR VOLUME OF REPAIRING AND REMODELING (IN THOUSANDS OF DOLLARS)	Under 2	2 to 3.9	4 to 5.9	6 to 7.9	8 to 9.9	10 to 11.9	12 to 13.9	14 to 15.9	16 to 17.9	18 to 19.9	20 to 29.9	30 to 39.9	40 to 49.9	50 to 74.9	75 to 99.9	100 to 124.9	125 to 149.9	150 and over	TOTAL
150 and over																			
125-149.9																			
100-124.9																			
75-99.9															1				1
50-74.9																		3	3
40-49.9													1	1			1	2	5
30-39.9												3	1	1		1		1	7
20-29.9											7	3		2					12
18-19.9										3	-	1		2					6
16-17.9									1	1	1		1	1	1				6
14-15.9								1	3	1	3			1					9
12-13.9							4	-	-	-	3	1	1		1				10
10-11.9						4	2	-	1	-	3	1							11
8-9.9					4	7	1	2	-	2	1			1					18
6-7.9				12	4	4	2	-	-	1	3								26
4-5.9			15	12	3	-	-	-	1	-	3				1				35
2-3.9		19	6	1	1	1	1	-	-	-	-								29
Under 2	20	7	2	-	1	1	-	-	1	-	-								32
None				1	1	-	1	-	-	-	2	-	1	-					6
TOTAL	20	26	23	26	14	17	11	3	7	8	26	9	5	9	4	1	1	6	216

DOLLAR VOLUME OF TOTAL FUR MANUFACTURING (IN THOUSANDS OF DOLLARS)

SECTION B

LIST OF PETITIONERS FOR EXEMPTION

The Commission has considered the petitions for exemptions submitted by the following firms:

Name of Firm	City or Town	State
L. S. Spiegel	Beverly Hills	California
Blenner Siegel	Los Angeles	
Gene Geft	"	
Ben Cohen	"	
T. V. Smith	"	
Herbert J. Stern	"	
Karl Smahel	"	
Walter Beake	"	
Martin Robert	"	
Frederick's Fur Shop	"	
Leslie Soo's	"	
Stout & Dennis, Inc.	"	
Frank Hoffmor Co.	"	
Rose Ann Sitkin	"	
Max Kaufman	"	
Pendl & Sons	"	
George M. Pauli	"	
Aldene E. Ethier	"	
Lillian Orr	"	
Harry Stenn	"	
Matyko's	"	
A. C. Fischer	"	
Ray A. Ramos	"	
Oxford Furrier	"	
Willard E. George, Ltd.	"	
S. Cal. Retail Fur Merchants Association	"	
Simpson Furs	"	
Bullwinkels'	Oakland	
F. N. Harry	Long Beach	
J. L. Lockwood	" "	
Mary R. Confar	San Diego	
Joseph Noonan	" "	
[illegible]'s Furs	" "	
M. Harris Corp.	San Francisco	
Louis Gassner, Inc.	" "	
Parisian Fur Reblending and Dyeing Company	" "	
Beetz Bros. and Co., Inc. (see also financial statement)	" "	
San Francisco Retail Fur Merchants' Association	" "	

Name of Firm	City or Town	State
Simpson Furs	San Francisco	
J. Salzman	" "	
A. H. Allgoewer	" "	
Schneider Bros., Inc.	" "	
William Pinkers	" "	
Begun Furs	" "	
Julius Garfinkel and Co.	Washington	District of Columbia
James A. Joseph	Chicago	Illinois
Sioux City Fur and Trimming Co.	Sioux City	Iowa
August Williges	" "	
Pelletetiers' Fine Furs	" "	
The Dikel Fur Co.	" "	
Rhomberg Fur Co.	Dubuque	
The Royal Furrier	Waterloo	
Charles Greenberg	Cedar Rapids	
I. J. Fox	Boston	Massachusetts
George Griffin & Son Co.	"	
Boston Fur Club	"	
L. C. Pazolt Co.	"	
Hall, Maddison & Levin Inc.	"	
E. Sundkvist & Co.	St. Paul	Minnesota
S. P. Glemaker, Inc.	" "	
B. W. Harris Mfg. Co. (Zero King)	" "	
H. Harris Co.	" "	
E. Albrecht & Son	" "	
Gordin & Ferguson Co.	" "	
Joseph Getzing Furs	" "	
Gershow	" "	
Soroshow Furs, Inc.	" "	
Tatkin Fur Co.	" "	
A. M. Miller Co.	" "	
Hope Furs, Inc.	" "	
E. Victor Ekholm	" "	
Franckowrac Co.	" "	
C. Forsman's	" "	
R. P. Webb	" "	
Harris Mfg. Co.	" "	
National Furriers' Guild Inc.	" "	
Harry Rosenberg	Minneapolis	
Frank C. Janicke	"	

Name of Firm	City or Town	State
Schwartz Bros. Mfg. Co.	Minneapolis	Minnesota
Independent Fur Co.	"	
Jans Fur Mfg. Co.	"	
D. Lenske Mfg. Co.	"	
Powers Mercantile Co.	"	
Furriers' Mfg. Co., Inc.	"	
The Dayton Co.	"	
Brown Bros., Inc.	"	
Roy H. Bjorkman, Inc.	"	
Gould Furs	"	
Raleigh's Armand Gero Fur Co.	"	
Berglund Co.	"	
Geo. E. Young Co., Inc.	"	
The Loring Fur Co.	"	
Kersten Furs	Rochester	
Conrad Fur Co., Inc.	Winona	
Master Furriers' Guild	Duluth	
Newton Annis Furs -	Detroit	Michigan
Aulabaugh Fur Co.	Omaha	Nebraska
Cadwallader Fur Mfg. Co.	Lincoln	
Peter T. Travers, Inc.	Omaha	
Henry E. Thompson	Omaha	
Assoc. of Furriers of the 9th Federal Reserve District & the States of Iowa and Nebraska		
Belt Fur Co.	Boundbrook	N. J.
Joseph Birnbaum	Flemington	
Halpern & Friedman, attorneys	Buffalo	N. Y.
Buffalo Fur Merchants' Assoc., Inc.	"	
Retail Furriers' in the City of Buffalo	"	
M. D. Spiegel Fur Corp.	315 7th Ave., N. Y. C.	
Retail Mfg. Furriers Assoc.	N. Y.	(Nat'l Assoc.)
State Fur Co.	Bismarck	N. D.
Wermuth Fur Co.	Sioux Falls	S. D.
Eilers' Furriers	Huron	" "
Joseph C. Bisha	La Crosse	Wisc.
Artic Fur Co.	Tacoma	Washington

Name of Firm	City or Town	State
Hudson Bay Fur Co.	Seattle	Washington
Baker Fur Co.	"	
Arctic Fur Co.	"	
Wash. Retail Furriers' Assoc.	"	
Spokane Fur Merchants' Assoc.	Spokane	
Wevley Bros.	"	

OFFICE OF THE NATIONAL RECOVERY ADMINISTRATION
THE DIVISION OF REVIEW

THE WORK OF THE DIVISION OF REVIEW

Executive Order No. 7075, dated June 15, 1935, established the Division of Review of the National Recovery Administration. The pertinent part of the Executive Order reads thus:

> The Division of Review shall assemble, analyze, and report upon the statistical information and records of experience of the operations of the various trades and industries heretofore subject to codes of fair competition, shall study the effects of such codes upon trade, industrial and labor conditions in general, and other related matters, shall make available for the protection and promotion of the public interest an adequate review of the effects of the Administration of Title I of the National Industrial Recovery Act, and the principles and policies put into effect thereunder, and shall otherwise aid the President in carrying out his functions under the said Title.

The study sections set up in the Division of Review covered these areas: industry studies, foreign trade studies, labor studies, trade practice studies, statistical studies, legal studies, administration studies, miscellaneous studies, and the writing of code histories. The materials which were produced by these sections are indicated below.

Except for the Code Histories, all items mentioned below are scheduled to be in mimeographed form by April 1, 1936.

THE CODE HISTORIES

The Code Histories are documented accounts of the formation and administration of the codes. They contain the definition of the industry and the principal products thereof: the classes of members in the industry; the history of code formation including an account of the sponsoring organizations, the conferences, negotiations and hearings which were held, and the activities in connection with obtaining approval of the code; the history of the administration of the code, covering the organization and operation of the code authority, the difficulties encountered in administration, the extent of compliance or non-compliance, and the general success or lack of success of the code; and an analysis of the operation of code provisions dealing with wages, hours, trade practices, and other provisions. These and other matters are canvassed not only in terms of the materials to be found in the files, but also in terms of the experiences of the deputies and others concerned with code formation and administration.

The Code Histories, (including histories of certain NRA units or agencies) are not mimeographed. They are to be turned over to the Department of Commerce in typewritten form. All told, approximately eight hundred and fifty (850) histories will be completed. This number includes all of the approved codes and some of the unapproved codes. (In Work Materials No. 18, Contents of Code Histories, will be found the outline which governed the preparation of Code Histories.)

(In the case of all approved codes and also in the case of some codes not carried to final approval, there are in NRA files further materials on industries. Particularly worthy of mention are the Volumes I, II and III which constitute the material officially submitted to the President in support of the recommendation for approval of each code. These volumes

set forth the origination of the code, the sponsoring group, the evidence advanced to support the proposal, the report of the Division of Research and Planning on the industry, the recommendations of the various Advisory Boards, certain types of official correspondence, the transcript of the formal hearing, and other pertinent matter. There is also much official information relating to amendments, interpretations, exemptions, and other rulings. The materials mentioned in this paragraph were of course not a part of the work of the Division of Review.)

THE WORK MATERIALS SERIES

In the work of the Division of Review a considerable number of studies and compilations of data (other than those noted below in the Evidence Studies Series and the Statistical Materials Series) have been made. These are listed below, grouped according to the character of the material. (In Work Materials No. 17, Tentative Outlines and Summaries of Studies in Process, these materials are fully described).

Industry Studies

Automobile Industry, An Economic Survey of
Bituminous Coal Industry under Free Competition and Code Regulation, Economic Survey of
Construction Industry and NRA Construction Codes, the
Electrical Manufacturing Industry, The
Fertilizer Industry, The
Fishery Industry and the Fishery Codes
Fishermen and Fishing Craft, Earnings of
Foreign Trade under the National Industrial Recovery Act
  Part A - Competitive Position of the United States in International Trade 1927-29 through 1934.
  Part B - Section 3 (e) of NIRA and its administration.
  Part C - Imports and Importing under NRA Codes.
  Part D - Exports and Exporting under NRA Codes.
Forest Products Industries, Foreign Trade Study of the
Iron and Steel Industry, The
Knitting Industries, The
Leather and Shoe Industries, The
Lumber and Timber Products Industry, Economic Problems of the
Men's Clothing Industry, The
Millinery Industry, The
Motion Picture Industry, The
Migration of Industry, The: The Shift of Twenty-Five Needle Trades From New York State, 1926 to 1934
National Income, A study of,
Paper Industry, The
Production, Prices, Employment and Payrolls in Industry, Agriculture and Railway Transportation, January 1923, to date
Retail Trades Study, The
Rubber Industry Study, The
Statistical Background of NRA
Textile Industry in the United Kingdom, France, Germany, Italy, and Japan
Textile Yarns and Fabrics
Tobacco Industry, The
Wholesale Trades Study, The
9675.

Women's Apparel Industry, Some Aspects of the

Trade Practice Studies

Commodities, Information Concerning: A Study of NRA and Related Experiences in Control
Distribution, Manufacturers' Control of: A Study of Trade Practice Provisions in Selected NRA Codes
Design Piracy: The Problem and Its Treatment Under NRA Codes
Electrical Mfg. Industry: Price Filing Study
Fertilizer Industry: Price Filing Study
Geographical Price Relations Under Codes of Fair Competition, Control of
Minimum Price Regulation Under Codes of Fair Competition
Multiple Basing Point System in the Lime Industry: Operation of the
Price Control in the Coffee Industry
Price Filing Under NRA Codes
Production Control Under NRA Codes, Some Aspects of,
Resale Price Maintenance Legislation in the United States
Retail Price Cutting, Restriction of, with special Emphasis on The Drug Industry.
Trade Practice Rules of The Federal Trade Commission (1914-1936): A classification for comparison with Trade Practice Provisions of NRA Codes.

Labor Studies

Employment, Payrolls, Hours, and Wages in 115 Selected Code Industries 1933-1935
Hours and Wages in American Industry
Labor Program Under the National Industrial Recovery Act, The
  Part A. Introduction
  Part B. Control of Hours and Reemployment
  Part C. Control of Wages
  Part D. Control of Other Conditions of Employment
  Part E. Section 7(a) of the Recovery Act
PRA Census of Employment, June, October,1933
Puerto Rico Needlework, Homeworkers Survey

Administrative Studies

Administrative and Legal Aspects of Stays, Exemptions and Exceptions, Code Amendments, Conditional Orders of Approval
Administrative Interpretations of NRA Codes
Administrative Law and Procedure under the NIRA
Agreements Under Sections 4(a) and 7(b) of the NIRA
Approved Codes in Industry Groups, Classification of
Basic Code, the -- (Administrative Order X-61)
Code Authorities and Their Part in the Administration of the NIRA
  Part A. Introduction
  Part B. Nature, Composition and Organization of Code Authorities
  Part C. Activities of the Code Authorities
  Part D. Code Authority Finances
  Part C. Summary and Evaluation
9675.

Code Compliance Activities of the NRA
Code Making Program of the NRA in the Territories, The
Code Provi ions and Related Subjects, Policy Statements Concerning
Content of NIRA Administrative Legislation
  Part A. Executive and Administrative Orders
  Part B. Labo: Provisions in the Codes
  Part C. Trade Practice Provisions in the Codes
  Part D. Administrative Provisions in the Codes
  Part E. Agreements under Sections 4(a) and 7(b)
  Part F. A Type Case: The Cotton Textile Code
Labels Under NRA, A Study of
Model Code and Model Provisions for Codes, Development of
National Recovery Administration, The: A Review and Evaluation of its Organization and Activities
NRA Insignia
President's Reemployment Agreement, The
President's Reemployment Agreement, Substitutions in Connection with the
Prison Labor Problem under NRA and the Prison Compact, The
Problems of Administration in the Overlapping of Code Definitions of Industries and Trades, Multiple Code Coverage, Classifying Individual Members of Industries and Trades
Relationship of NRA to Government Contracts and Contracts Involving the Use of Government Funds
Relationship of NRA with other Federal Agencies
Relationship of NRA with States and Muncipalities
Sheltered Workshops Under NRA
Uncodified Industries: A Study of Factors Limiting the Code Making Program

Legal Studies

Anti-Trust Laws and Unfair Competiti n
Collective Bargaining Agreements, the Right of Individual Employees to Enforce Provisions of
ommerce Clause, Possible Federal Regulation of the Employer-Employee Relationship U nder the
Delegation of Power, Certain Phases of the Principle of, with Reference to Federal Industrial Regulatory Legislation
Enforcement, Extra-Judicial Methods of
Federal Regulation through the Joint Employment of the Power of Taxation and the Spending Power
Government Contract Provisions as a Means of Establishing Proper Econ mic Standards, Legal Memorandum on P ssibility of
Intrastate Activities Which so Affect Interstate Commerce as to Bring them Under the Commerce Clause, Cases on
Legislative Possibilities of the State Constitutions
Post Office and Post Road Power -- Can it be Used as a Means of Federal Industrial Regulation?
State Recovery Legislation in Aid of Federal Recovery Legislation History and Analysis
Tariff Rates to Secure Proper Standards of Wages and Hours, the Possibility of Variation in
rade Practices and the Anti-Trust Laws
Treaty Making Power of the United States
War Power, Can it be Used as a Means of Federal Regulation of Child Labor?
9675.

THE EVIDENCE STUDIES SERIES

The Evidence Studies were originally undertaken to gather material for pending court cases. After the Schechter decision the project was continued in order to assemble data for use in connection with the studies of the Division of Review. The data are particularly concerned with the nature, size and operations of the industry; and with the relation of the industry to interstate commerce. The industries covered by the Evidence Studies account for more than one-half of the total number of workers under codes. The list of these studies follows:

Automobile Manufacturing Industry
Automotive Parts and Equipment Industry
Baking Industry
Boot and Shoe Manufacturing Industry
Bottled Soft Drink Industry
Builders' Supplies Industry
Canning Industry
Chemical Manufacturing Industry
Cigar Manufacturing Industry
Coat and Suit Industry
Construction Industry
Cotton Garment Industry
Dress Manufacturing Industry
Electrical Contracting Industry
Electrical Manufacturing Industry
Fabricated Metal Products Mfg. Industry and Metal Finishing and Metal Coating Industry
Fishery Industry
Furniture Manufacturing Industry
General Contractors Industry
General Contractors Industry
Graphic Arts Industry
Graphic Arts Industry
Gray Iron Foundry Industry
Hosiery Industry
Infant's and Children's Wear Industry
Iron and Steel Industry
Leather Industry
Lumber and Timber Products Industry
Mason Contractors Industry
Men's Clothing Industry
Motion Picture Industry
Motor Vehicle Retailing Trade
Needlework Industry of Puerto Rico
Painting and Paperhanging Industry
Photo Engraving Industry
Plumbing Contracting Industry
Retail Lumber Industry
Retail Trade Industry
Retail Tire and Battery Trade Industry
Rubber Manufacturing Industry
Rubber Tire Manufacturing Industry
Shipbuilding Industry
Silk Textile Industry
Structural Clay Products Industry
Throwing Industry
Trucking Industry
Waste Materials Industry
Wholesale and Retail Food Industry
Waste Materials Industry
Wholesale and Retail Food Industry
Wholesale Fresh Fruit and Vegetable Industry
Wool Textile Industry

THE STATISTICAL MATERIALS SERIES

This series is supplementary to the Evidence Studies Series. The reports include data on establishments, firms, employment, payrolls, wages, hours, production capacities, shipments, sales, consumption, stocks, prices, material costs, failures, exports and imports. They also include notes on the principal qualifications that should be observed in using the data, the technical methods employed, and the applicability of the material to the study of the industries concerned. The following numbers appear in the series:
9675.

Asphalt Shingle and Roofing Industry
Business Furniture
Candy Manufacturing Industry
Carpet and Rug Industry
Cement Industry
Cleaning and Dyeing Trade
Coffee Industry
Copper and Brass Mill Products Industry
Cotton Textile Industry
Electrical Manufacturing Industry
9675.
Fertilizer Industry
Funeral Supply Industry
Glass Container Industry
Ice Manufacturing Industry
Knitted Outerwear Industry
Paint, Varnish, and Lacquer, Mfg. Industry
Plumbing Fixtures Industry
Rayon and Synthetic Yarn Producing Industry
Salt Producing Industry